

Exhibit A



McDonald Hopkins LLC
Suite 2100
600 Superior Avenue, E
Cleveland, Ohio 44114

P. 216.348.5400
F. 216.348.5474
mcdonaldhopkins.com
Fed. ID 34-1059058

Chicago | Cleveland | Columbus | Detroit | Miami | West Palm Beach

Invoices Due Upon Receipt

TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

JANUARY 10, 2020
Invoice No: 1373947

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH DECEMBER 31, 2019 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES
EXPENSES

\$

TOTAL

\$

AGING OF ACCOUNT

0 - 30 DAYS	31 - 60 DAYS	61 - 90 DAYS	91 + DAYS	TOTAL
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PAYMENT BY WIRE TRANSFER, ACH, OR CREDIT CARD
CONTACT ACCOUNTS RECEIVABLE AT (216) 348-5445
OR MHACCOUNTING@MCDONALDHOPKINS.COM

PAYMENT BY CHECK
MCDONALD HOPKINS LLC
ATTN: ACCOUNTS RECEIVABLE
600 SUPERIOR AVE, E.
SUITE 2100
CLEVELAND, OHIO 44114



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EXPENSES

COURT REPORTER - GEORGE STAUDUHR
TRANSCRIPT

518.50

EXPENSES

TOTAL

STATEMENT OF ACCOUNT

STATEMENT DATED CURRENT
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TOTAL AMOUNT DUE

\$

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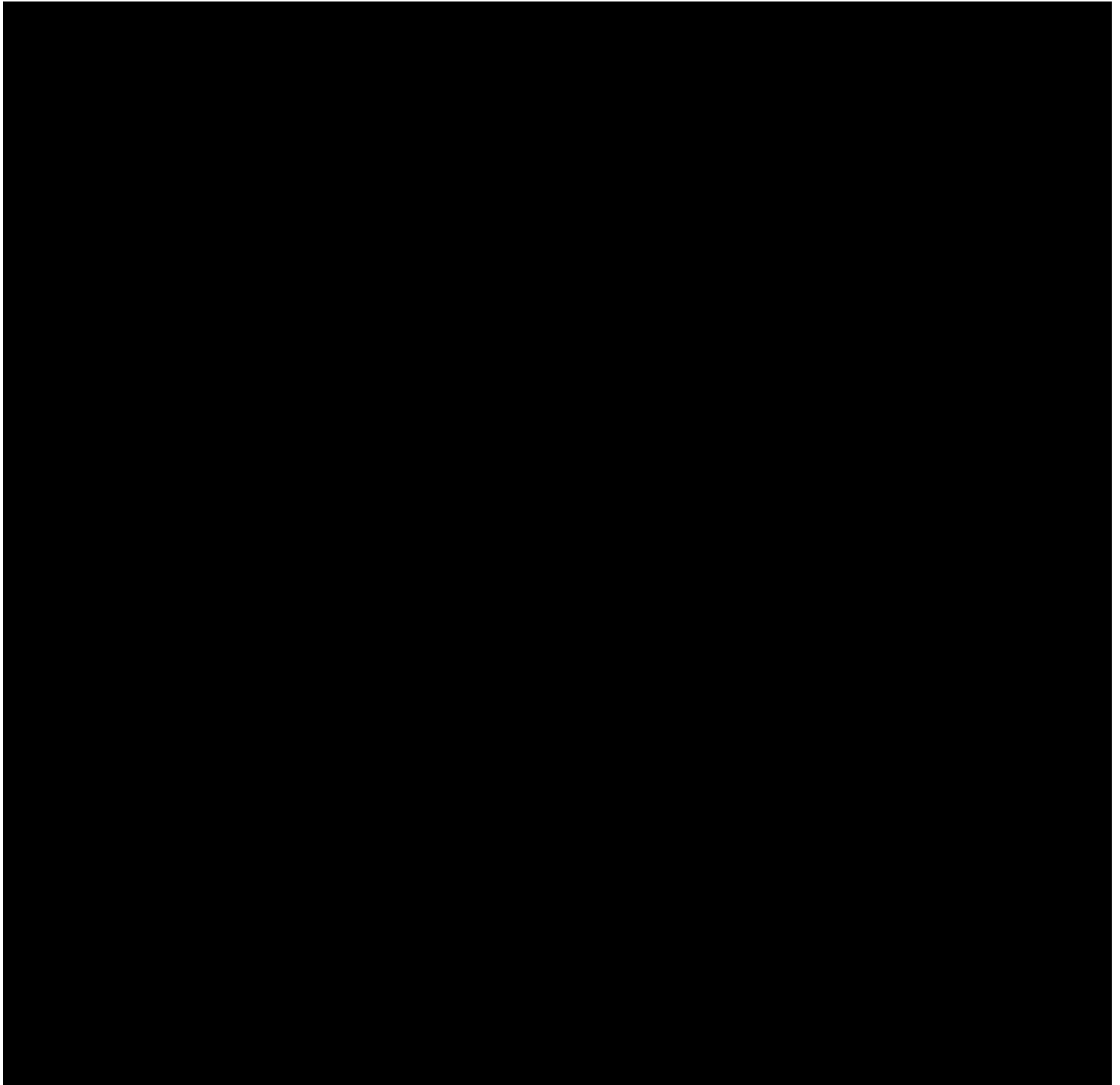
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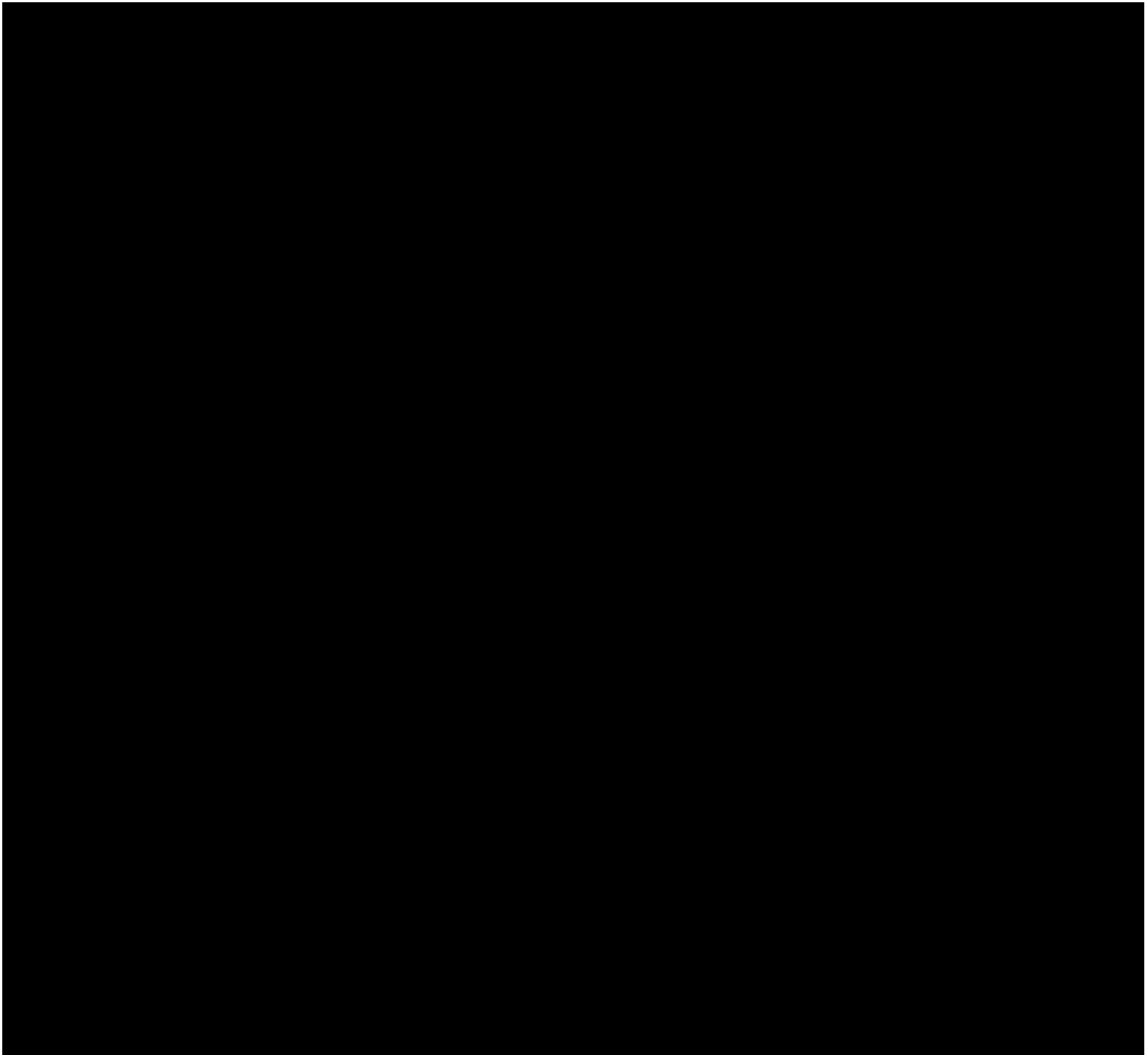
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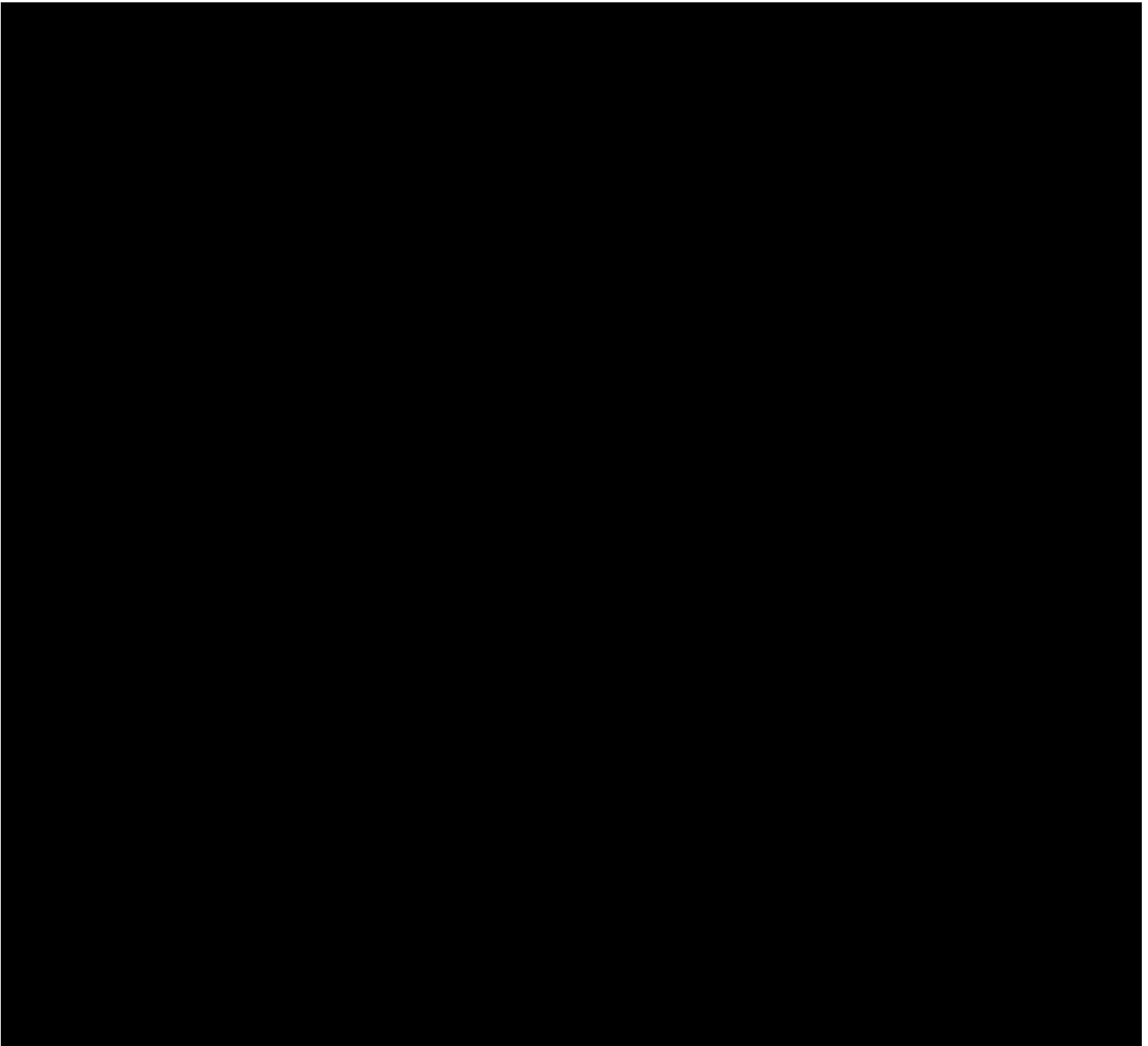
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RE: TERVES V. YUEYANG ET AL.
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12/18/19 MEET AND TELECONFERENCE WITH A. SHERMAN REGARDING SEIZURE ORDER EXECUTED BY MARSHALS; REVIEW VERIFIED COMPLAINT, SEIZURE ORDER, AND OTHER FILINGS SERVED ON A. SHERMAN BY MARSHALS; REVIEW LAW AND FACTS TO PREPARE FOR HEARING ON SEIZURE ORDER; DRAFT OUTLINE OF DIRECT EXAMINATION OF A. SHERMAN FOR SEIZURE HEARING; DRAFT ORAL ARGUMENT FOR SEIZURE HEARING; DRAFT CROSS-EXAMINATION OF L. SWOR (MMP OWNER) FOR SEIZURE HEARING; WORK WITH A. SHERMAN TO PREPARE FOR SEIZURE HEARING.

MATTHEW J CAVANAGH 8.00 hours at 475.00/hr 3,800.00

12/19/19 PREPARE FOR HEARING ON SEIZURE ORDER; ATTEND HEARING ON SEIZURE ORDER.

MATTHEW J CAVANAGH 7.90 hours at 475.00/hr 3,752.50

12/20/19 TELECONFERENCE WITH JUDGE NUGENT'S CHAMBERS REGARDING ACCESS TO SEALED DOCUMENTS; DRAFT EMAIL TO MMP'S COUNSEL REGARDING ACCESS TO SEALED DOCUMENTS.

MATTHEW J CAVANAGH 0.40 hours at 475.00/hr 190.00



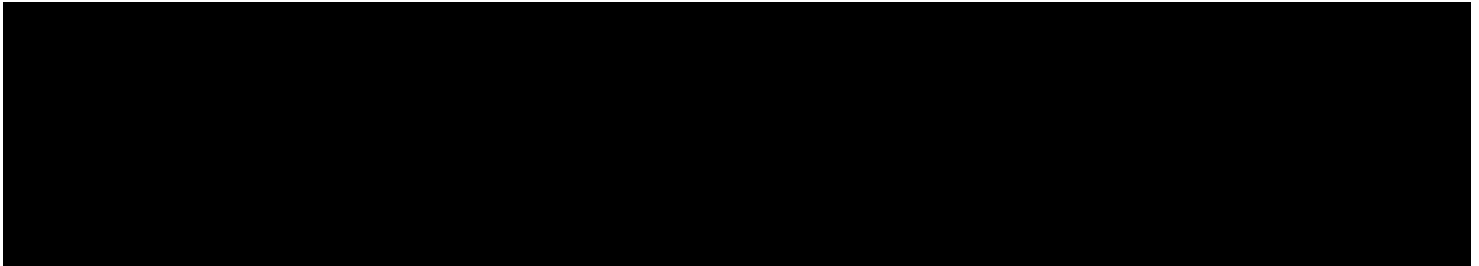
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RE: TERVES V. YUEYANG ET AL.
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12/23/19

[REDACTED]

[REDACTED] REVIEW SEALED DOCUMENTS
PRODUCED BY MMP'S COUNSEL AND PLAN STRATEGY REGARDING
FAILURE TO SERVE A SUMMONS AND BEGIN PLANNING DEFENSE
STRATEGY.

MATTHEW J CAVANAGH

~~2.60 hours at 475.00/hr 1,235.00~~

0.5 hours at 475.00/hr = \$237.50



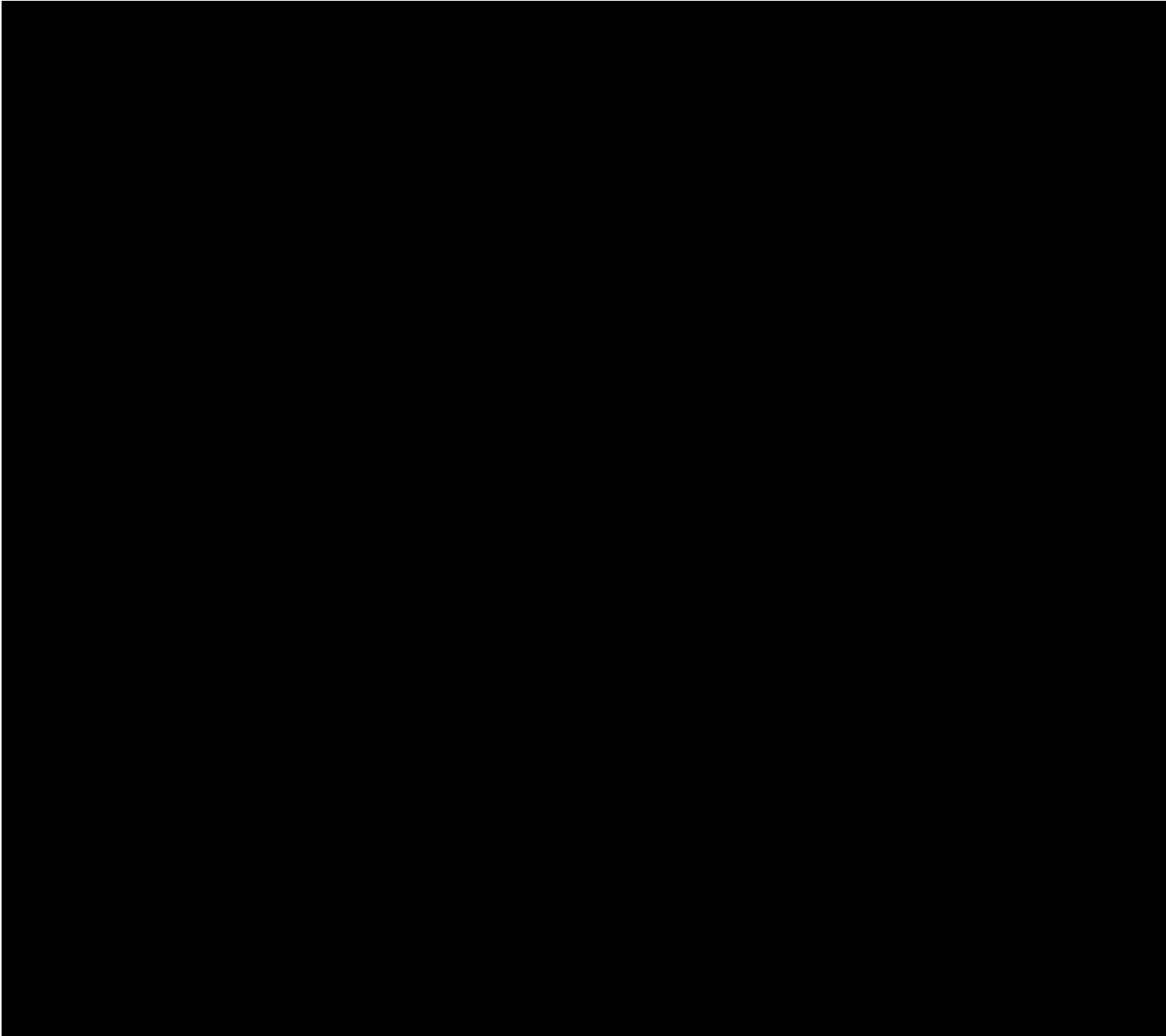
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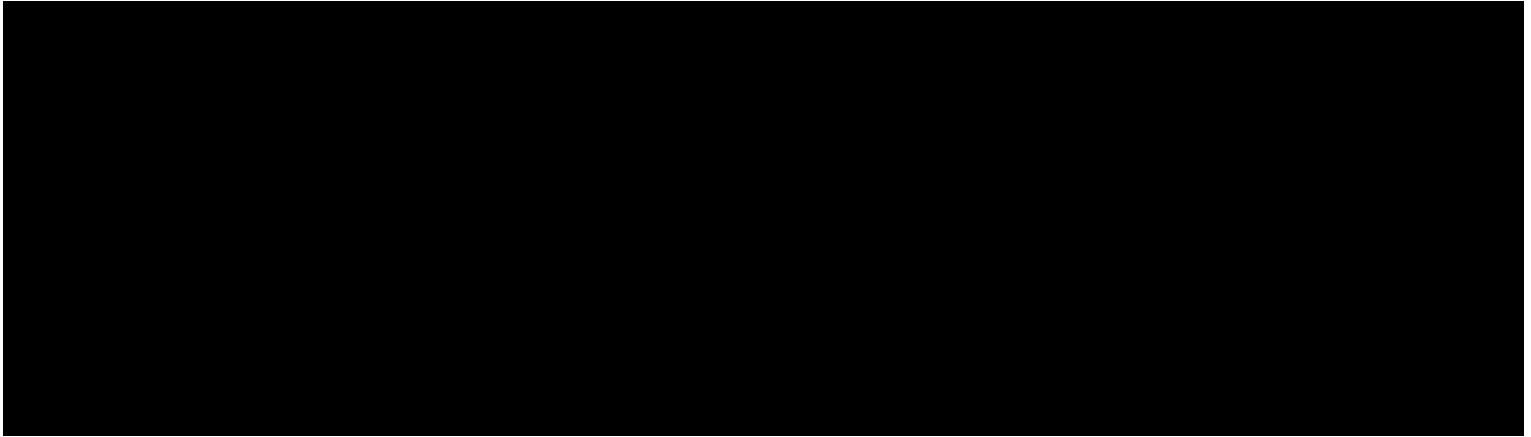
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TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

FEBRUARY 21, 2020
Invoice No: 1377284

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH JANUARY 31, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES
EXPENSES

TOTAL

AGING OF ACCOUNT

0 - 30 DAYS	31 - 60 DAYS	61 - 90 DAYS	91 + DAYS	TOTAL

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EXPENSES

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STATEMENT OF ACCOUNT

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ADJUSTMENTS OR CREDITS
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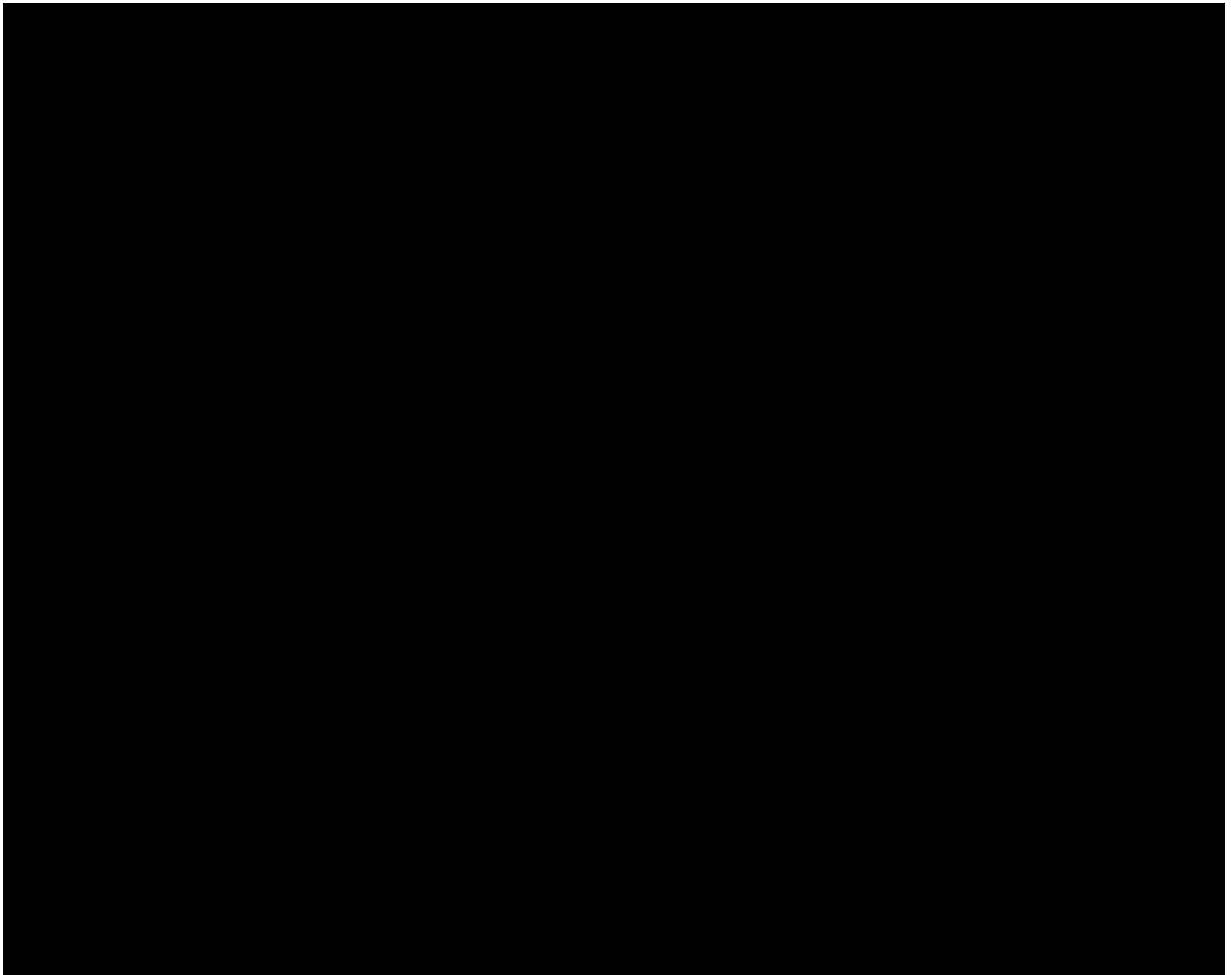
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RE: TERVES V. YUEYANG ET AL.
46657-00003



01/03/20 RESEARCH OF CASE LAW ON [REDACTED] FOR
PURPOSE OF MOTION TO DISMISS.

ANDREW GORDON-SEIFERT	0.40 hours at	350.00/hr	140.00
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01/05/20 FURTHER RESEARCH AND ANALYSIS OF CASE LAW FOR PURPOSE
OF DRAFTING MOTION TO DISMISS.

ANDREW GORDON-SEIFERT 0.80 hours at 350.00/hr 280.00

01/06/20 FURTHER REVIEW OF CASE LAW FOR PURPOSE OF MOTION TO
DISMISS.

ANDREW GORDON-SEIFERT 0.40 hours at 350.00/hr 140.00

01/07/20 REVIEW AND ANALYSIS RE WHETHER CERTAIN DISSOLVABLE
SALT IS NOT A TRADE SECRET. ANALYSIS OF PATENTS
DISCLOSING SAID SALT PUBLICALLY. CORRESPONDENCE WITH
TERVES RE PUBLICLY AVAILABLE FIDNINGS. STRATEGY RE
SUIT AND THE SUBPOENAS.

DAVID B CUPAR 2.20 hours at 570.00/hr 1,254.00

01/07/20

REVIEW EMAILS FROM COUNSEL FOR MMP THREATENING TO
MOVE FOR PRELIMINARY INJUNCTION AND ADDRESSING
HEARING AND DRAFT RESPONSE TO SAME;

SEARCH USPTO'S PATENT
APPLICATION DATABASE FOR EVIDENCE THAT PURPORTED
TRADE SECRET ASSERTED BY MMP IS KNOWN IN THE PRIOR
ART; REVIEW PRIOR ART REFERENCES PROVIDED BY A.
SHERMAN WITH RESPECT TO MMP'S TRADE SECRET CLAIM;
CONTINUE TO PERFORM LEGAL RESEARCH REGARDING THE
APPLICABILITY OF THE LITIGATION PRIVILEGE AND
AGAINST TRADE SECRET CLAIMS.

MATTHEW J CAVANAGH ~~3.60 hours at 475.00/hr 1,710.00~~

2.00 hours at 475/hr = 950



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RE: TERVES V. YUEYANG ET AL.
46657-00003

01/07/20 FURTHER RESEARCH AND ANALYSIS OF CASE LAW FOR PURPOSE
OF DRAFTING POTENTIAL MOTION TO DISMISS.

ANDREW GORDON-SEIFERT 2.60 hours at 350.00/hr 910.00

01/08/20 STRATEGY RE WHETHER CERTAIN DISSOLVABLE SALT IS A
TRADE SECRET. [REDACTED]

DAVID B CUPAR ~~2.00 hours at 570.00/hr~~ 1,140.00
1.0 hours at 570 / hr = 570.00

01/09/20 FURTHER RESEARCH OF THEORIES TO SUPPORT A MOTION TO
DISMISS.

ANDREW GORDON-SEIFERT 1.10 hours at 350.00/hr 385.00



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RE: TERVES V. YUEYANG ET AL.
46657-00003

01/13/20 REVIEW JAN. 13 EMAIL FROM COUNSEL FOR MMP REGARDING
THREAT TO MOVE FOR PRELIMINARY INJUNCTION AND DRAFT
RESPONSE TO SAME; [REDACTED]

MATTHEW J CAVANAGH

~~3.80 hours at 475.00/hr 1,805.00~~
0.5 hours at 475 / hr = 237.50



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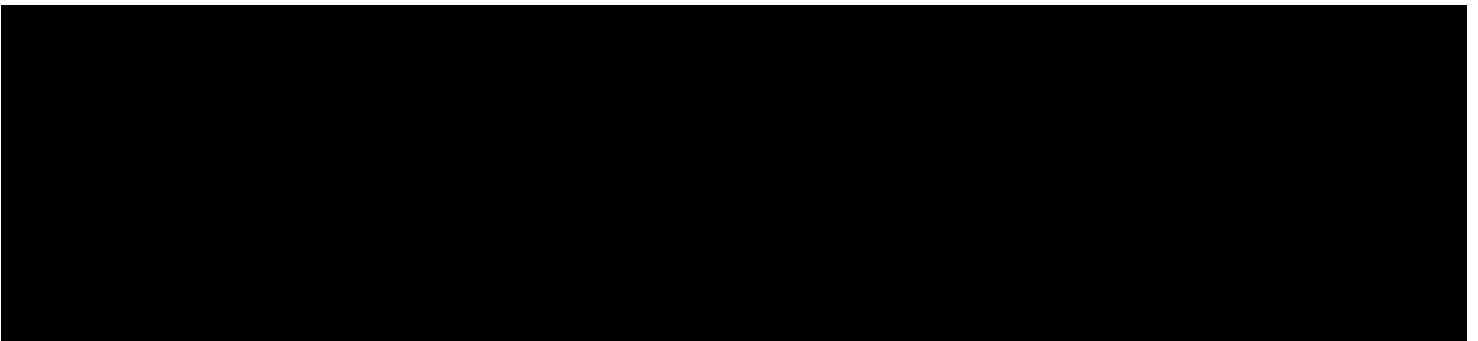
RE: TERVES V. YUEYANG ET AL.
46657-00003

01/17/20 PERFORM LEGAL RESEARCH TO FIND CASELAW WHERE COURT
DISMISSED TRADE SECRET COMPLAINT BASED ON TRADE
SECRET ALLEGATION THAT IS NOT PLAUSIBLE; PERFORM
LEGAL RESEARCH TO CONFIRM THAT MOTION TO DISMISS CAN
RELY ON PATENTS AND PUBLICLY-AVAILABLE RECORDS AS
EVIDENCE THAT TRADE SECRET ALLEGED BY MMP IS KNOWN IN
PRIOR ART; PERFORM LEGAL RESEARCH TO FIND CASES IN
WHICH "PROTECTIVE ORDER" WAS DEEMED ADEQUATE TO
PROTECT AGAINST TRADE SECRETS OBTAINED IN DISCOVERY;
PERFORM LEGAL RESEARCH TO EVALUATE WHETHER
"LITIGATION PRIVILEGE" IS VIABLE GROUND ON WHICH TO
SEEK DISMISSAL OF TRADE SECRET COMPLAINT; REVIEW
"STORK-WERKSPOOR DIESEL" CASE BY FIFTH CIRCUIT
REGARDING INAPPLICABILITY OF "TRADE SECRET ACT" TO
EVIDENCE OBTAINED IN DISCOVERY.

MATTHEW J. CAVANAGH 6.00 hours at 475.00/hr 2,850.00

01/20/20 CONTINUE TO PERFORM LEGAL RESEARCH REGARDING LEGAL
GROUNDS FOR SEEKING DISMISSAL OF TRADE SECRET CLAIMS
BY MMP.

MATTHEW J CAVANAGH 0.50 hours at 475.00/hr 237.50





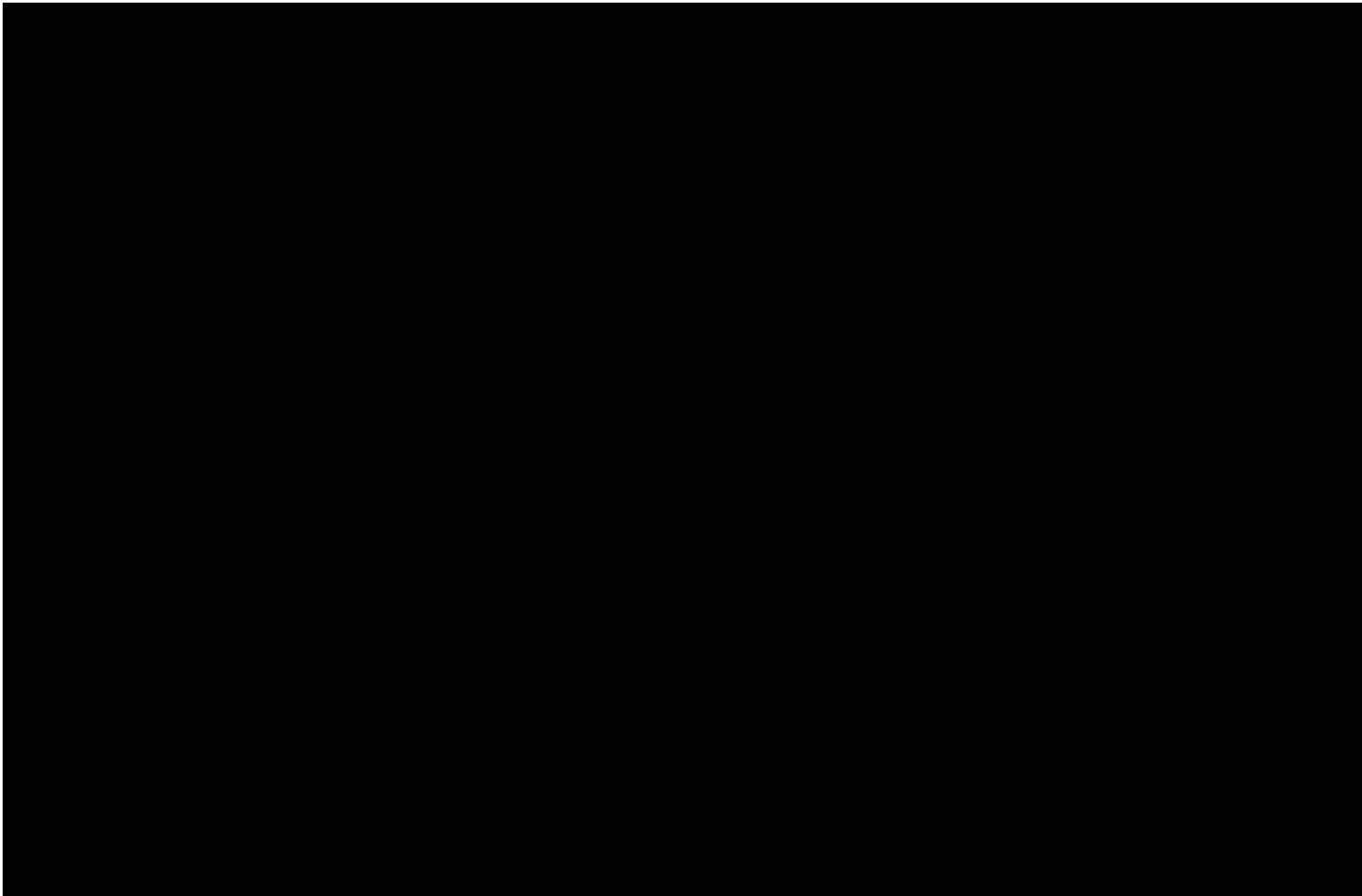
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01/27/20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] DRAFT

SECTION OF MOTION TO DISMISS TRADE SECRET CLAIM THAT
EXPLAINS "LEGAL STANDARD" FOR OBTAINING A DISMISSAL
UNDER RULE 12(B)(6); DRAFT SECTION OF MOTION TO
DISMISS THAT EXPLAINS THAT CLAIMS ATTACKING THE
ATTORNEY-CLIENT RELATIONSHIP SHOULD BE DISMISSED AT
THE EARLIEST POSSIBLE STAGE; DRAFT SECTION OF MOTION
TO DISMISS THAT EXPLAINS THERE IS NO SUCH THING AS
THE THREE-WORD PHRASE ON WHICH PLAINTIFFS HAVE SUED.

MATTHEW J CAVANAGH

~~2.40 hours at 475.00/hr 1,140.00~~
1.8 hours at 475 / hr = 855.00

01/30/20 PLAN STRATEGY REGARDING TIMING OF MOTION TO DISMISS
AND CONFER WITH MCDONALD HOPKINS' ATTORNEYS REGARDING
SAME.

MATTHEW J CAVANAGH

0.30 hours at 475.00/hr 142.50



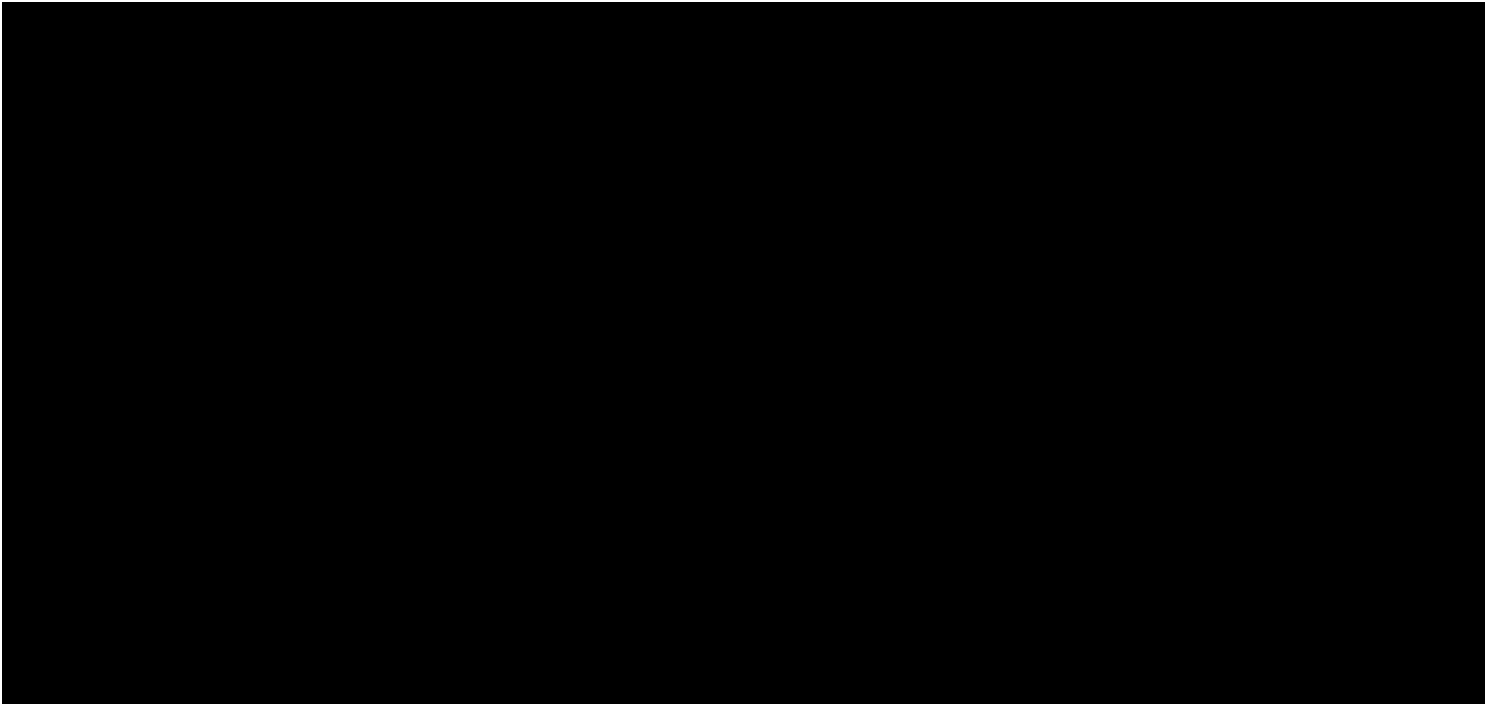
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TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

MARCH 9, 2020
Invoice No: 1378650

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH FEBRUARY 29, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

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MARCH 9, 2020
Invoice No: 1378650

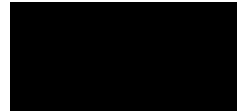
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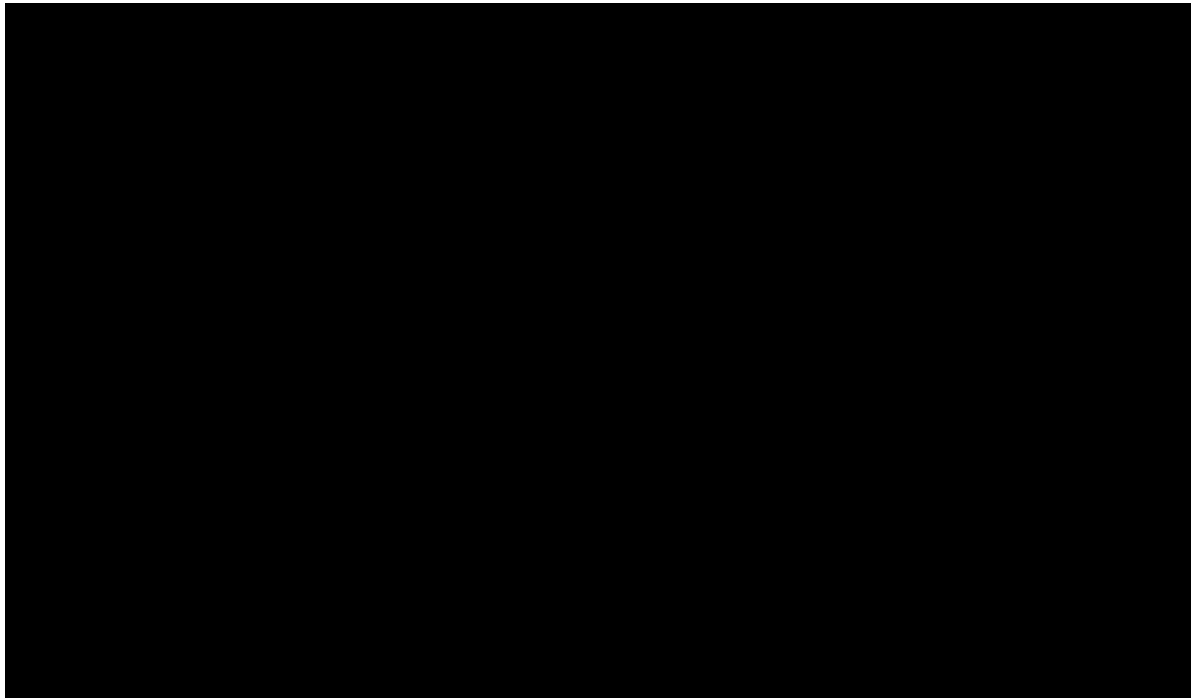
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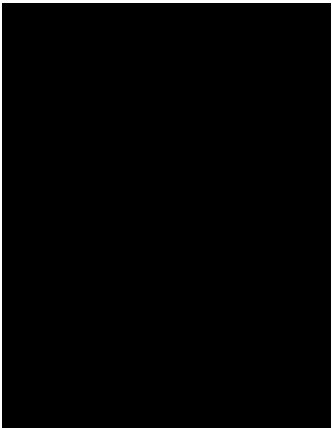
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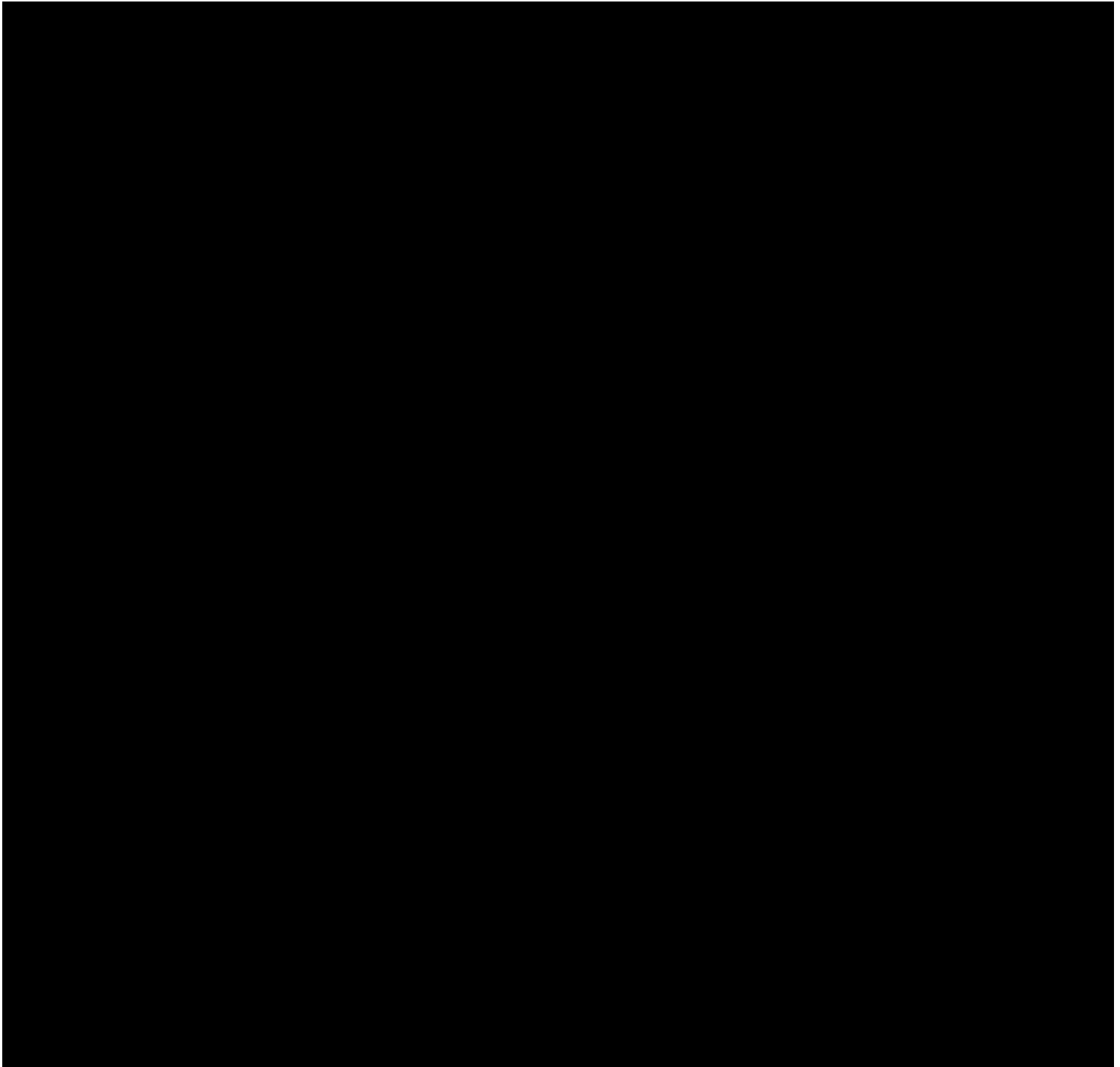
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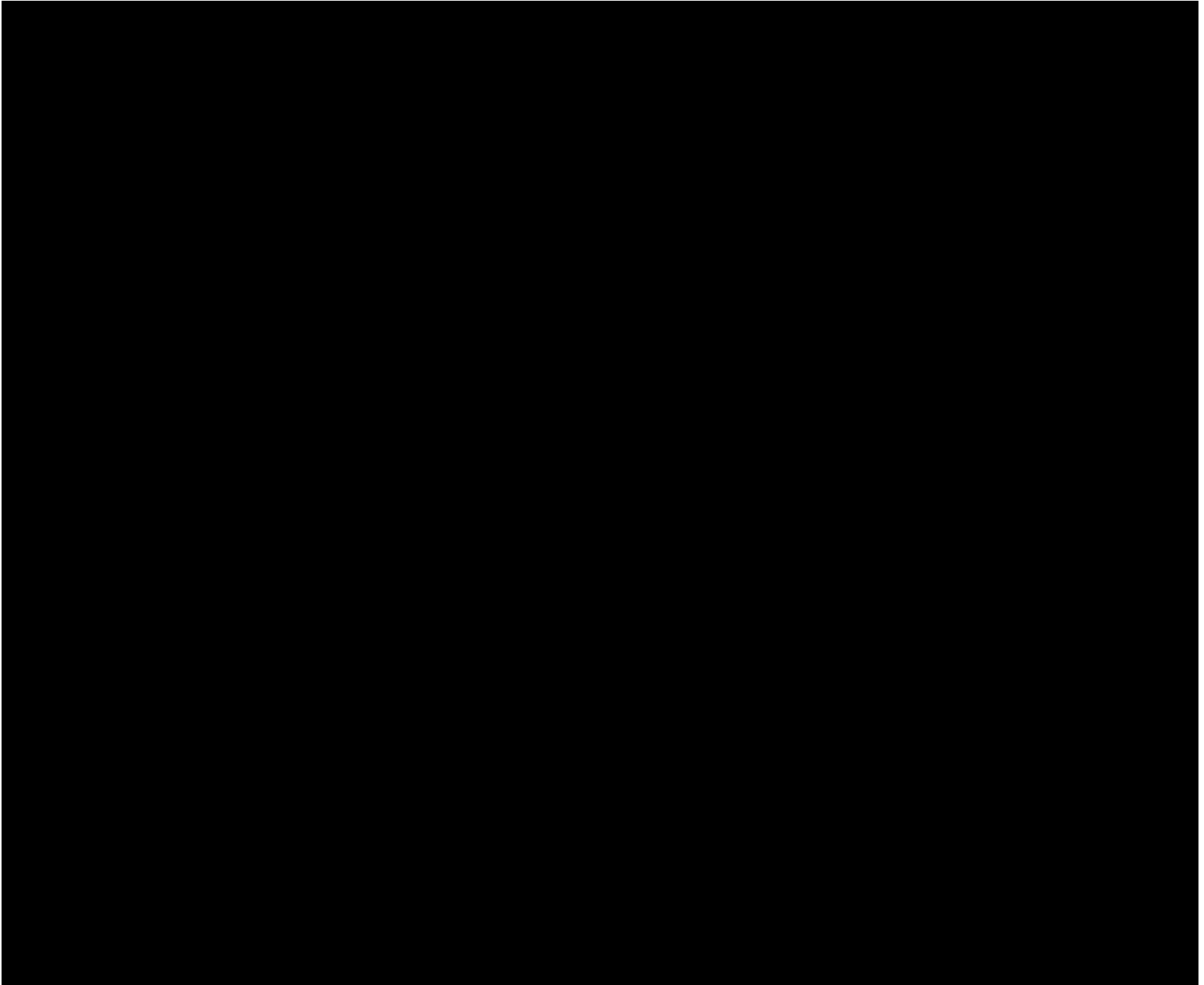
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02/11/20

[REDACTED]
[REDACTED]
[REDACTED]

CONTINUE TO
DRAFT MOTION TO DISMISS TRADE SECRET COMPLAINT AND
CONTINUE TO PERFORM LEGAL RESEARCH IN SUPPORT OF
SAME.

MATTHEW J CAVANAGH

~~3.20 hours at 475.00/hr 1,520.00~~
2.70 hours at 475 / hr = 1,282.50

[REDACTED]



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02/20/20 EXCHANGE EMAILS WITH MCDONALD HOPKINS' COUNSEL
REGARDING PREPARATIONS FOR STATUS CONFERENCE IN TRADE
SECRET CASE AND DISCUSS UNIFIED DEFENSE STRATEGY AND
CONTENT OF MOTIONS TO DISMISS.

MATTHEW J CAVANAGH 0.80 hours at 475.00/hr 380.00

02/26/20 CONTINUE TO DRAFT AND REVISE MOTION TO DISMISS TRADE
SECRET COMPLAINT.

MATTHEW J CAVANAGH 3.20 hours at 475.00/hr 1,520.00

02/27/20 CONTINUE TO DRAFT AND REVISE MOTION TO DISMISS TRADE
SECRET COMPLAINT.

MATTHEW J CAVANAGH 4.20 hours at 475.00/hr 1,995.00



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Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003

02/28/20 PREPARE LIST OF TALKING POINTS FOR STATUS CONFERENCE
WITH JUDGE NUGENT ON ECOMETAL AND TRADE SECRET CASES;

[REDACTED]
[REDACTED]
[REDACTED]

PREPARE FOR AND ATTEND CASE STATUS CONFERENCE WITH
JUDGE NUGENT ON MMP TRADE SECRET CASE; REVIEW DRAFT
OF PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW
PROVIDED BY MMP'S COUNSEL ON SEIZURE ORDER FINDING;
REVIEW CASES INVOLVING SEIZURE ORDERS UNDER U.S.
TRADE SECRET LAW TO DETERMINE WHETHER MMP HAS
IMMEDIATE RIGHT TO APPEAL DENIAL OF SEIZURE ORDER;
REVIEW FEDERAL RULE 52 TO DETERMINE WHETHER DETAILED
PROPOSED FINDINGS AND CONCLUSIONS ARE REQUIRED FOR
MMP TO APPEAL; ANALYZE CASE STRATEGY TO DETERMINE
WHETHER TO SEEK STAY OF CASE PENDING MMP'S APPEAL OF
SEIZURE ORDER DENIAL;

MATTHEW J CAVANAGH ~~3.50 hours at 475.00/hr 1,662.50~~

2.8 hours at 475.00 / hr = 1,330.00



McDonald Hopkins LLC
Suite 2100
600 Superior Avenue, E
Cleveland, Ohio 44114

P. 216.348.5400
F. 216.348.5474
mcdonaldhopkins.com
Fed. ID 34-1059058

Chicago | Cleveland | Columbus | Detroit | Miami | West Palm Beach

Invoices Due Upon Receipt

TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

APRIL 14, 2020
Invoice No: 1381734

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH MARCH 31, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES
EXPENSES

TOTAL

AGING OF ACCOUNT

0 - 30 DAYS	31 - 60 DAYS	61 - 90 DAYS	91 + DAYS	TOTAL

WIRE TRANSFER INFORMATION
MCDONALD HOPKINS LLC
THE HUNTINGTON NATIONAL BANK
ABA NUMBER: 044000024
ACCOUNT NUMBER: 01662878158
SWIFT CODE: HUNTUS33
REFERENCE: INVOICE NUMBER

ACH/EFT INFORMATION
MCDONALD HOPKINS LLC
THE HUNTINGTON NATIONAL BANK
ABA NUMBER: 041000153
ACCOUNT NUMBER: 01662878158
SWIFT CODE: HUNTUS33
REFERENCE: INVOICE NUMBER

PAY BY CREDIT CARD
SEND EMAIL TO
MHACCOUNTING@
MCDONALDHOPKINS.COM

ACCOUNTS RECEIVABLE
MCDONALD HOPKINS LLC
ATTN: ACCOUNTS RECEIVABLE
600 SUPERIOR AVE, E.
SUITE 2100
CLEVELAND, OHIO 44114



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APRIL 14, 2020
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RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH MARCH 31, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEEES FOR SERVICES

EXPENSES

EXPENSES

TOTAL

STATEMENT OF ACCOUNT

STATEMENT DATED CURRENT
PREVIOUS BALANCE
ADJUSTMENTS OR CREDITS
TOTAL AMOUNT DUE

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MCDONALD HOPKINS LLC
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03/02/20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] REVIEW ECF# 15
(COURT ORDER DISSOLVING SEIZURE ORDER); PERFORM LEGAL
RESEARCH TO DETERMINE WHETHER MMP CAN APPEAL WHEN
ORDER [REDACTED]
[REDACTED]

MATTHEW J CAVANAGH

~~1.70 hours at 475.00/hr~~
1.2 hours at 475 / hr = 570.00

~~807.50~~

03/03/20

[REDACTED]
[REDACTED]
[REDACTED]
REVIEW EMAIL FROM MMP'S COUNSEL REGARDING REQUEST TO
RE-OPEN TIME TO APPEAL ORDER DISSOLVING SEIZURE ORDER
AND ANALYZE SAME; REVIEW FED. R. 54 AND 52 TO
DETERMINE WHETHER OR NOT COURT SHOULD ISSUE FINDINGS
OF FACT AND CONCLUSIONS OF LAW ON SEIZURE ORDER;
DRAFT EMAIL RESPONSE TO MMP'S COUNSEL AND CONFER WITH
MCDONALD HOPKINS' COUNSEL REGARDING SAME; [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] REVIEW REVISED PROPOSED FINDINGS AND
CONCLUSIONS OFFERED BY ECOMETAL; REVIEW ECOMETAL'S
REQUEST TO UNSEAL RECORD AND CONSIDER STRATEGY FOR
RESPONDING TO SAME; [REDACTED]
[REDACTED]
[REDACTED]

MATTHEW J CAVANAGH

~~3.20 hours at 475.00/hr~~
2.8 hours at 475.00 / hr = 1,306.25

~~1,520.00~~



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RE: TERVES V. YUEYANG ET AL.
46657-00003

03/04/20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] REVIEW CASE FILE FOR MMP TRADE SECRET
CASE, IDENTIFY DOCUMENTS THAT WILL BE UNSEALED, AND
DRAFT EMAIL TO A. SHERMAN REGARDING UNSEALING OF
DOCUMENTS; [REDACTED]
[REDACTED]
[REDACTED]

MATTHEW J CAVANAGH

~~1.50 hours at 475.00/hr~~
0.4 hours at 475 / hr = 190.00

~~712.50~~



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RE: TERVES V. YUEYANG ET AL.
46657-00003

03/10/20

[REDACTED]
[REDACTED] REVIEW MARCH 10 EMAIL FROM E. TALLEY
(COUNSEL FOR MMP) REGARDING TRADE SECRET CASE,
REQUEST TO SEAL CERTAIN PARTS OF RECORD, AND PROPOSED
FINDINGS AND CONCLUSIONS OF LAW; CONFER WITH MCDONALD
HOPKINS' COUNSEL REGARDING MMP'S REQUEST FOR APPEAL
AND STRATEGY REGARDING PROPOSED FINDINGS AND
CONCLUSIONS DUE BY FRIDAY, MAR. 14.

MATTHEW J CAVANAGH ~~3.10 hours at 475.00/hr 1,472.50~~

2.0 hours at 475 / hr = 950.00



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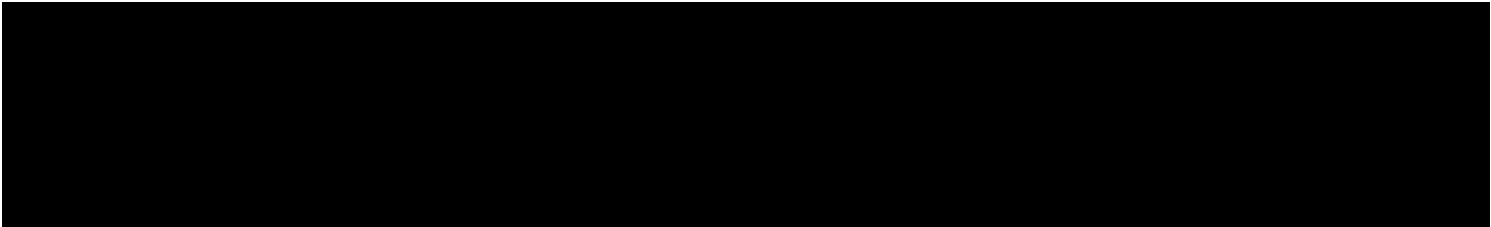
RE: TERVES V. YUEYANG ET AL.
46657-00003

03/11/20 REVIEW FEDERAL RULE 52 TO ASSESS WHETHER SPECIFIC
PROPOSED FINDINGS/CONCLUSIONS ARE REQUIRED BEYOND
WHAT JUDGE NUGENT HAS ALREADY ENTERED TO DISSOLVE THE
SEIZURE ORDER; FINALIZE EMAIL TO MMP'S COUNSEL
SETTING FORTH TERVES' POSITION REGARDING PROPOSED
FINDINGS/CONCLUSIONS AND DOCUMENTS TO BE KEPT UNDER
SEAL IN THE TRADE SECRET CASE; PERFORM LEGAL RESEARCH
TO DETERMINE WHETHER DISSOLUTION OF SEIZURE ORDER IS
"DENIAL OF AN INTERLOCUTORY INJUNCTION" UNDER FEDERAL
RULE 52; DRAFT AND REVISE PROPOSED FINDINGS OF FACT
AND CONCLUSIONS OF LAW ON DISSOLUTION OF SEIZURE
ORDER DUE ON MAR. 13; [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
BEGIN DRAFT PROPOSED FINDINGS OF FACT AND CONCLUSIONS
OF LAW FOR COURT ORDER DISSOLVING SEIZURE ORDER.

MATTHEW J CAVANAGH

8.30 hours at 475.00/hr 3,942.50





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RE: TERVES V. YUEYANG ET AL.
46657-00003

03/12/20 DRAFT COVER PLEADING TO PROPOSED FINDINGS/CONCLUSIONS
IN TRADE SECRET CASE, EXPLAINING WHY ADDITIONAL
FINDINGS ARE NO REQUIRED; DRAFT RESPONSE TO MMP'S
MAR. 11 EMAIL REGARDING MAINTAINING CERTAIN DOCUMENTS
UNDER SEAL AND ATTEMPTS TO AGREE ON CERTAIN FINDINGS
OF FACT/CONCLUSIONS OF LAW; REVISE PROPOSED
FINDINGS/CONCLUSIONS TO ADDRESS EXISTENCE OF "TRADE
SECRET" ISSUE; [REDACTED]

MATTHEW J CAVANAGH 4.70 hours at 475.00/hr 2,232.50
3.0 hours at 475.00/hr = 1,425.00

03/13/20 REVIEW, ANALYSIS AND REVISION OF THE FINDINGS OF FACT
AND CONCLUSIONS OF LAW FOR THE EX PARTE SEIZURE
ACTION.

DAVID B CUPAR 0.80 hours at 570.00/hr 456.00



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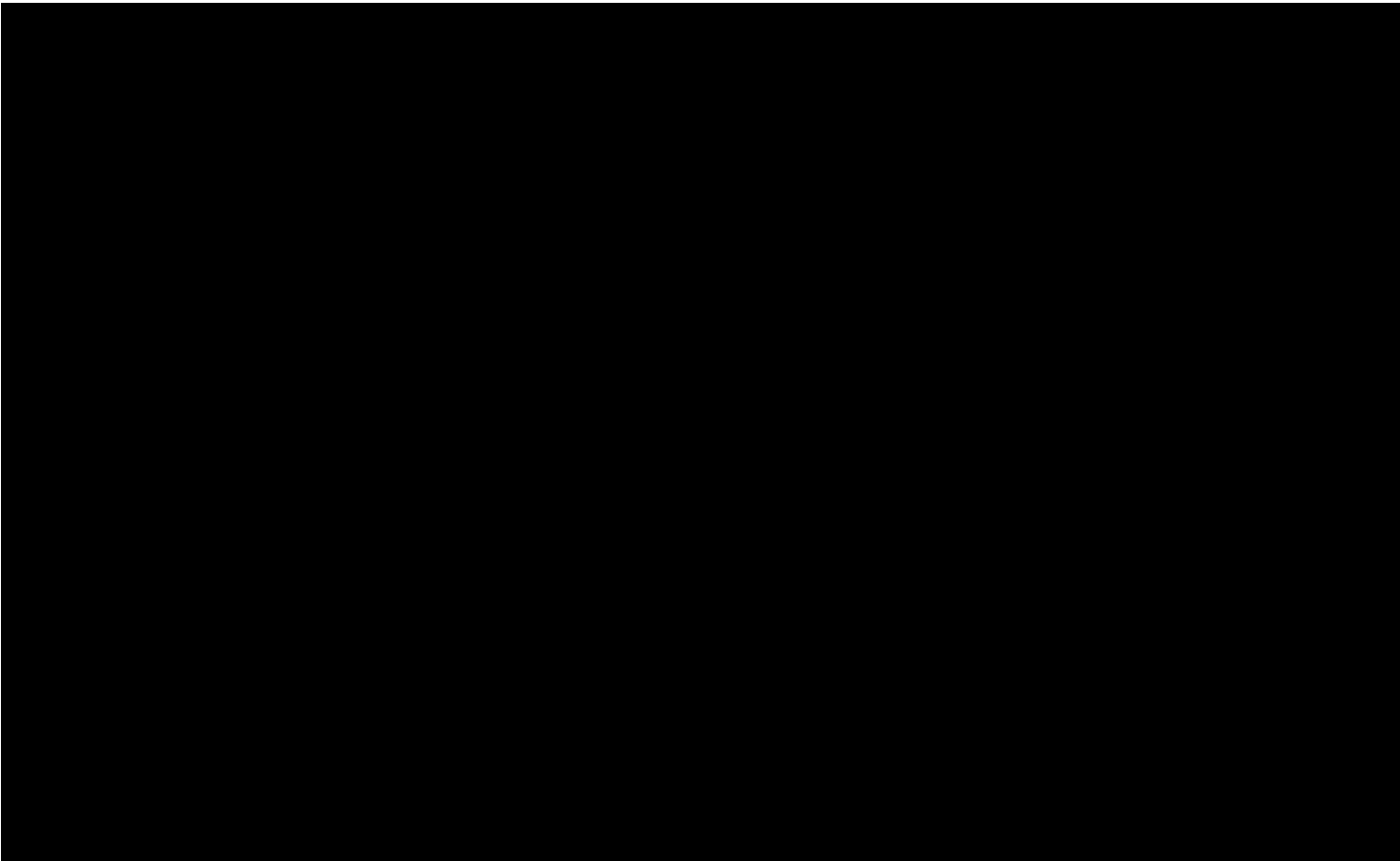
Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003

03/13/20 CONTINUE TO DRAFT AND REVISE PROPOSED
FINDINGS/CONCLUSIONS IN SUPPORT OF ORDER DISSOLVING
SEIZURE ORDER, FINALIZE SAME, AND APPROVE FOR FILING
AND SERVICE; [REDACTED]

MATTHEW J CAVANAGH

~~3.60 hours at 475.00/hr 1,710.00~~
2.0 hours at 475.00/hr = 950.00





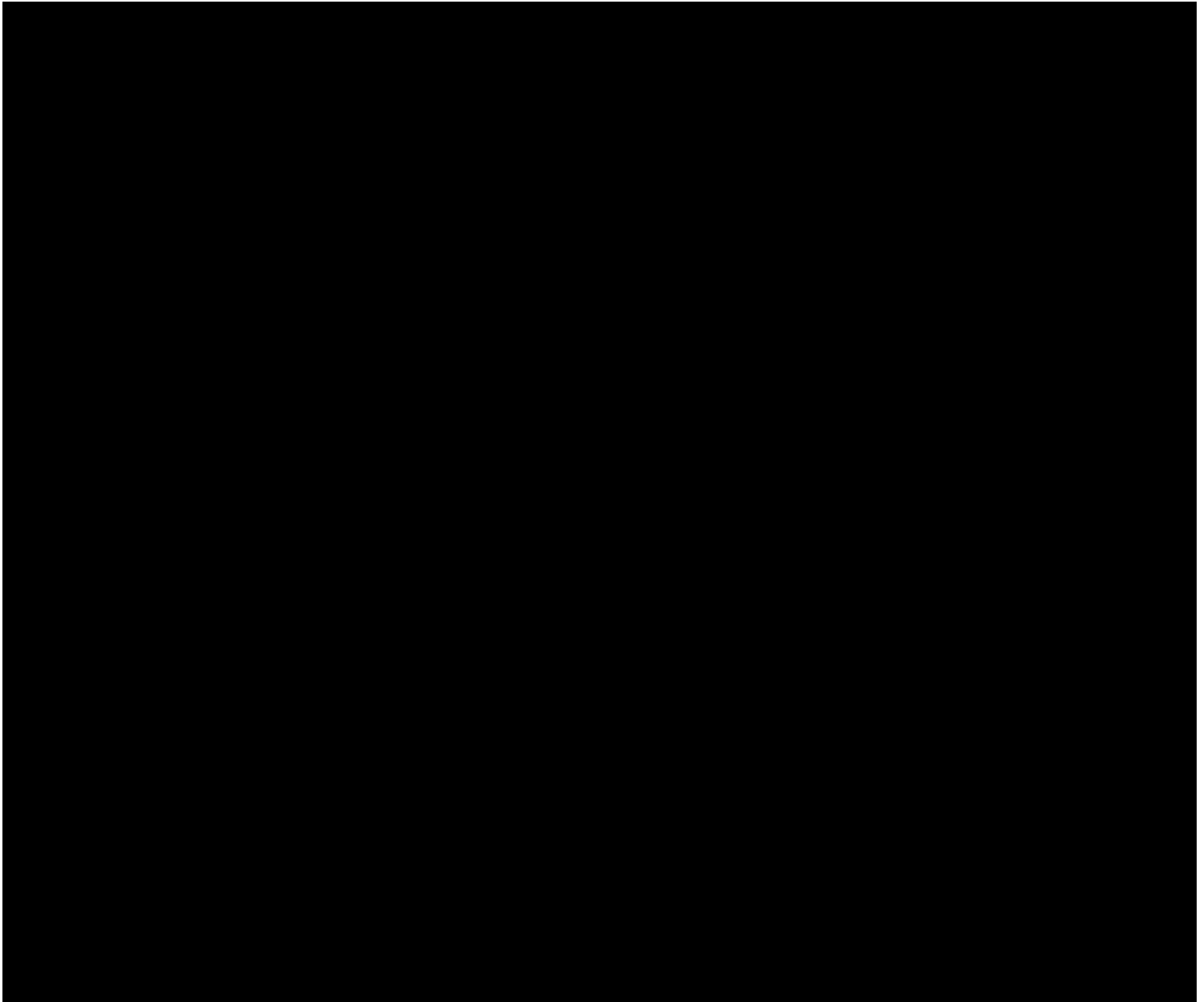
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RE: TERVES V. YUEYANG ET AL.
46657-00003

03/19/20 REVIEW REDACTIONS PROPOSED BY ECOMETAL TO HEARING
TRANSCRIPT AND MOTION FOR EX PARTE SEIZURE ORDER;
TELECONFERENCE WITH MH'S COUNSEL TO DISCUSS STRATEGY
FOR RESPONDING TO ISSUES RAISED BY MMP ABOUT
PROTECTIVE ORDER AND OTHER MATTERS RELATING TO THE
TRADE SECRET CASE; DRAFT EMAIL TO MMP'S ATTORNEY;

[REDACTED]

MATTHEW J CAVANAGH ~~3.80 hours at 475.00/hr~~ ~~1,805.00~~
0.8 hours at 475.00/hr = 456.00

[REDACTED]



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RE: TERVES V. YUEYANG ET AL.
46657-00003

03/20/20 FINALIZE EMAIL TO MMP'S COUNSEL REGARDING SEALING
RECORDS AND ISSUES RELATED TO APPEAL; REVIEW COURT'S
MAR. 20 ORDER ISSUING FINDINGS OF FACT AND
CONCLUSIONS OF LAW; EXCHANGE EMAILS WITH E. TALLEY
(ATTORNEY FOR MMP) REGARDING STAYING TRADE SECRET
CASE ON APPEAL; [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] REVIEW PROPOSED REDACTIONS TO MOTION FOR EX
PARTE SEIZURE ORDER BY MMP AND DRAFT RESPONSE TO
SAME; PERFORM LEGAL RESEARCH TO SUPPORT MOTION TO
STAY TRADE SECRET CASE PENDING APPEAL; DRAFT AND
REVISE MOTION TO STAY DISTRICT COURT CASE PENDING
APPEAL BY MMP; [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

MATTHEW J CAVANAGH

~~4.30 hours at 475.00/hr 2,042.50~~
1.8 hours at 475.00/hr = 855.00

[REDACTED]



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RE: TERVES V. YUEYANG ET AL.
46657-00003

03/25/20 ANALYSIS OF PROPOSED MOTION TO STAY. [REDACTED]

DAVID B CUPAR

~~0.60 hours at 570.00/hr~~
0.3 hours at 570.00/hr = 171.00

342.00

03/25/20 [REDACTED]

REVIEW MAR. 25 EMAIL FROM MMP'S COUNSEL REGARDING COURT UNSEALING DOCKET; TELECONFERENCE WITH JUDGE NUGENT'S CHAMBERS REGARDING UNSEALING OF COURT DOCKET AND PROCEDURE FOR RESOLVING SAME; DRAFT AND REVISE MOTION TO FILE TERVES' PROPOSED FINDINGS/CONCLUSIONS UNDER SEAL; REVIEW EXHIBITS TO PROPOSED FINDINGS/CONCLUSIONS AND MARK "TRADE SECRET" INFORMATION TO BE REDACTED FROM PUBLIC-VERSION OF FILING; EXCHANGE EMAILS WITH MMP'S COUNSEL REGARDING SEALING CONFIDENTIAL INFORMATION; FINALIZE MOTION TO FILE UNDER SEAL AND APPROVE SAME FOR ELECTRONIC FILING.

MATTHEW J CAVANAGH

~~3.40 hours at 475.00/hr~~
3.0 hours at 475.00/hr = 1,425.00

~~1,615.00~~



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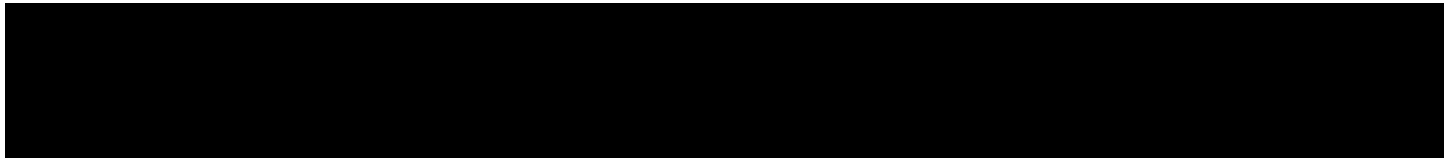
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RE: TERVES V. YUEYANG ET AL.
46657-00003

03/26/20	REVIEW DRAFT PROTECTIVE ORDER PROVIDED BY COUNSEL FOR MMP AND CONSIDER STRATEGY REGARDING PROTECTIVE ORDER; PERFORM LEGAL RESEARCH TO CONFIRM THAT PROTECTIVE ORDER IS UNNECESSARY AND THAT MMP SHOULD MOVE TO FILE DOCUMENTS "UNDER SEAL" UNDER LOCAL RULE 5.2; DRAFT AND REVISE EMAIL TO MMP'S COUNSEL CHALLENGING REQUEST FOR PROTECTIVE ORDER.	MATTHEW J CAVANAGH	0.90 hours at	475.00/hr	427.50
03/27/20	REVIEW COURT ORDER GRANTING MOTION TO FILE DOCUMENTS UNDER SEAL IN TRADE SECRET CASE; DRAFT NOTICE OF FILING REDACTED VERSION OF FILINGS NOW UNDER SEAL, AS ORDERED BY THE COURT, AND APPROVE SAME FOR ELECTRONIC FILING; REVIEW COURT DOCKET TO ENSURE THAT FILINGS ARE NOW UNDER SEAL.	MATTHEW J CAVANAGH	0.70 hours at	475.00/hr	332.50
03/30/20	PERFORM LEGAL RESEARCH TO SUPPORT ARGUMENT THAT DISSOLUTION OF SEIZURE ORDER IS NOT IMMEDIATELY APPEALABLE; EVALUATE WHETHER TO MOVE TO DISMISS MMP'S FORTHCOMING APPEAL BASED ON LEGAL RESEARCH FINDINGS; READ AND ANALYZE [REDACTED] [REDACTED] [REDACTED] REVIEW LEGISLATIVE HISTORY FOR U.S. DEFEND TRADE SECRETS ACT TO DETERMINE WHETHER IT ADDRESSES APPEALABILITY OF SEIZURE ORDER RULINGS; REVIEW SIXTH CIRCUIT DECISIONS THAT HELD ORDERS ON TEMPORARY RESTRAINING ORDERS ARE NOT APPEALABLE AND ASSESS IMPACT ON CASE.	MATTHEW J CAVANAGH	2.40 hours at	475.00/hr	1,140.00





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RE: TERVES V. YUEYANG ET AL.
46657-00003

03/31/20 REVIEW MMP'S DRAFT MOTION TO FILE DOCUMENTS UNDER
SEAL AND CONFER WITH MH'S COUNSEL REGARDING SAME;
REVIEW REDACTED VERSIONS OF TRANSCRIPT AND OTHER
FILINGS TO BE SUBMITTED BY MMP TO DETERMINE WHETHER
TERVES OPPOSE MMP'S FORTHCOMING MOTION TO FILE UNDER
SEAL; REVIEW CASELAW REGARDING LIMITED NATURE OF
"INTERLOCUTORY" APPEALS TO PLAN ARGUMENTS FOR MOTION
TO DISMISS APPEAL DUE TO LACK OF APPELLATE
JURISDICTION.

MATTHEW J CAVANAGH	1.30 hours at	475.00/hr	617.50
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Invoices Due Upon Receipt

TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

MAY 18, 2020
Invoice No: 1384533

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH APRIL 30, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES
EXPENSES

TOTAL

AGING OF ACCOUNT

0 - 30 DAYS	31 - 60 DAYS	61 - 90 DAYS	91 + DAYS	TOTAL
-------------	--------------	--------------	-----------	-------

PAYMENT BY WIRE TRANSFER, ACH, OR CREDIT CARD
CONTACT ACCOUNTS RECEIVABLE AT (216) 348-5445
OR MHACCOUNTING@MCDONALDHOPKINS.COM

PAYMENT BY CHECK
MCDONALD HOPKINS LLC
ATTN: ACCOUNTS RECEIVABLE
600 SUPERIOR AVE, E.
SUITE 2100
CLEVELAND, OHIO 44114



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MAY 18, 2020
Invoice No: 1384533

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46657-00003

THROUGH APRIL 30, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES

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STATEMENT OF ACCOUNT

STATEMENT DATED CURRENT

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CONTACT ACCOUNTS RECEIVABLE AT (216) 348-5445
OR MHACCOUNTING@MCDONALDHOPKINS.COM

PAYMENT BY CHECK
MCDONALD HOPKINS LLC
ATTN: ACCOUNTS RECEIVABLE
600 SUPERIOR AVE, E.
SUITE 2100
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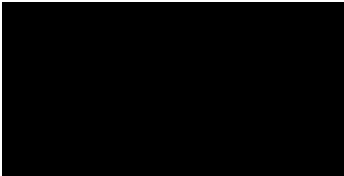
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PREVIOUS BALANCE
ADJUSTMENTS OR CREDITS
TOTAL AMOUNT DUE





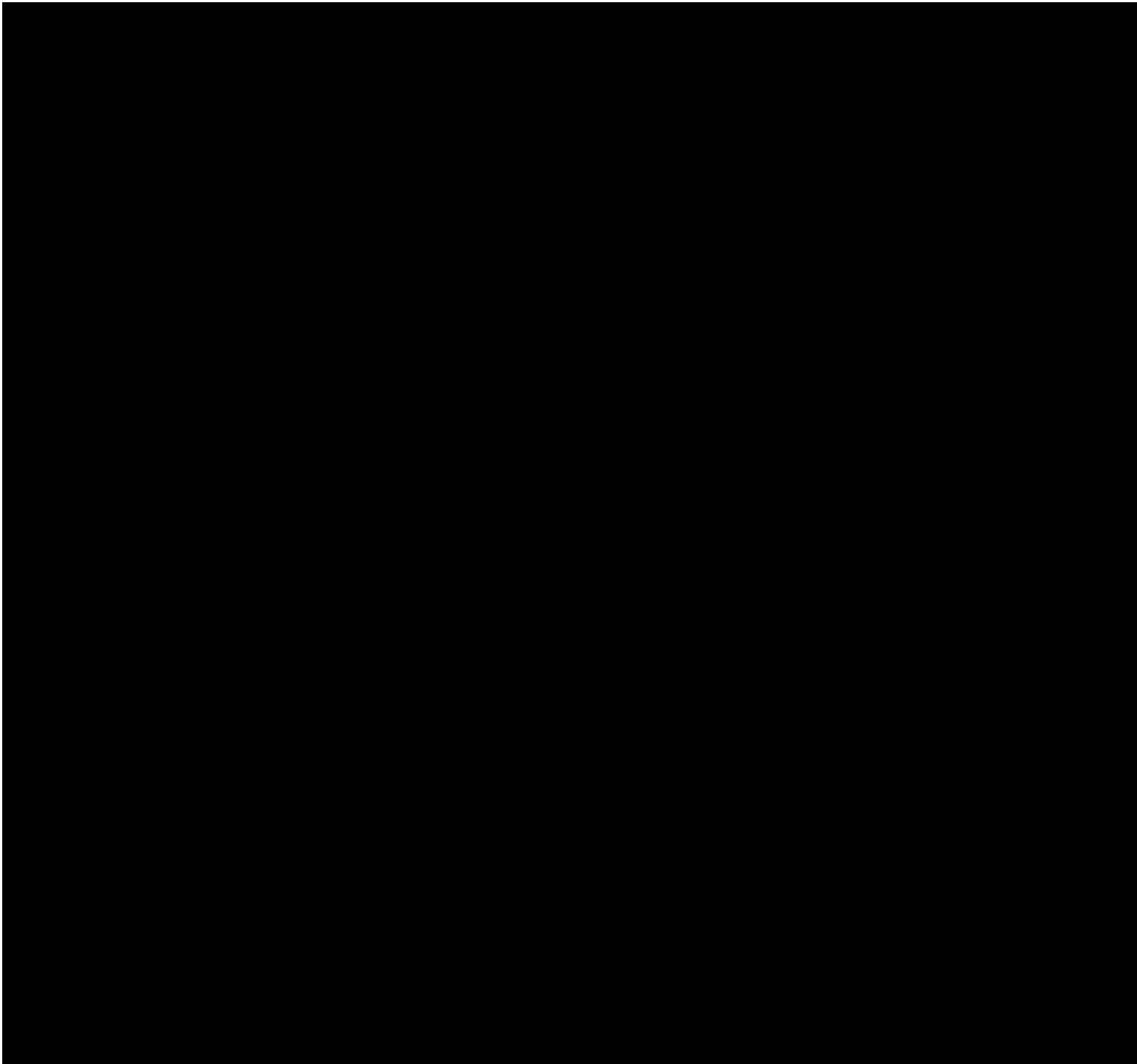
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RE: TERVES V. YUEYANG ET AL.
46657-00003

04/03/20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] REVIEW NOTICE OF APPEAL FILED BY MMP AND
DRAFT UPDATE EMAIL TO A. SHERMAN REGARDING SAME;
REVIEW A. SHERMAN EMAIL AND RESPOND TO QUESTIONS BY
A. SHERMAN; REVIEW DOCUMENTS FILED UNDER SEAL AND ON
PUBLIC DOCKET BY MMP; REVISE MOTION TO STAY CASE
PENDING APPEAL AND FORWARD TO E. TALLY FOR REVIEW;
REVIEW EDITS TO MOTION TO STAY BY MMP, FINALIZE
MOTION, AND APPROVE SAME FOR ELECTRONIC FILING.

MATTHEW J CAVANAGH

~~2.20 hours at 475.00/hr 1,045.00~~
1.5 hours at 475.00/hr = 712.50

[REDACTED]

[REDACTED]



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RE: TERVES V. YUEYANG ET AL.
46657-00003

04/07/20

[REDACTED]
[REDACTED]
[REDACTED] REVIEW
JUDGE NUGENT'S ORDER DENYING MOTION TO STAY TRADE
SECRET CASE PENDING MMP'S APPEAL ON EX PARTE SEIZURE
ORDER AND PLAN CASE STRATEGY ACCORDINGLY; REVIEW
HALLIBURTON V. AXIS TECHNOLOGIES CASE AS
INVESTIGATIVE WORK INTO WILKINSON AND LOREN SWOR'S
TRADE SECRET MISAPPROPRIATION FROM HALLIBURTON;
REVIEW BRIAN WILKINSON'S BANKRUPTCY CASE TO DISCHARGE
TRADE SECRET JUDGMENT; [REDACTED]

[REDACTED]
[REDACTED] DRAFT
EMAIL TO MMP'S COUNSEL REGARDING CONSENT TO 30-DAY
EXTENSION TO RESPOND TO TRADE SECRET COMPLAINT BASED
ON COURT'S REFUSAL TO STAY CASE; ATTEMPT TO CALL
JUDGE NUGENT'S CHAMBERS REGARDING ORDER DENYING STAY
OF CASE PENDING APPEAL; [REDACTED]

[REDACTED]
[REDACTED] DRAFT
AND REVISE MOTION FOR EXTENSION OF ANSWER DEADLINE IN
TRADE SECRET CASE AND DRAFT EMAIL TO MH'S COUNSEL
REGARDING SAME; FINALIE MOTION FOR EXTENSION AND
APPROVE SAME FOR ELECTRONIC FILING; [REDACTED]

MATTHEW J CAVANAGH

~~4.40 hours at 475.00/hr 2,090.00~~
3.0 hours at 475.00/hr = 1,425.00



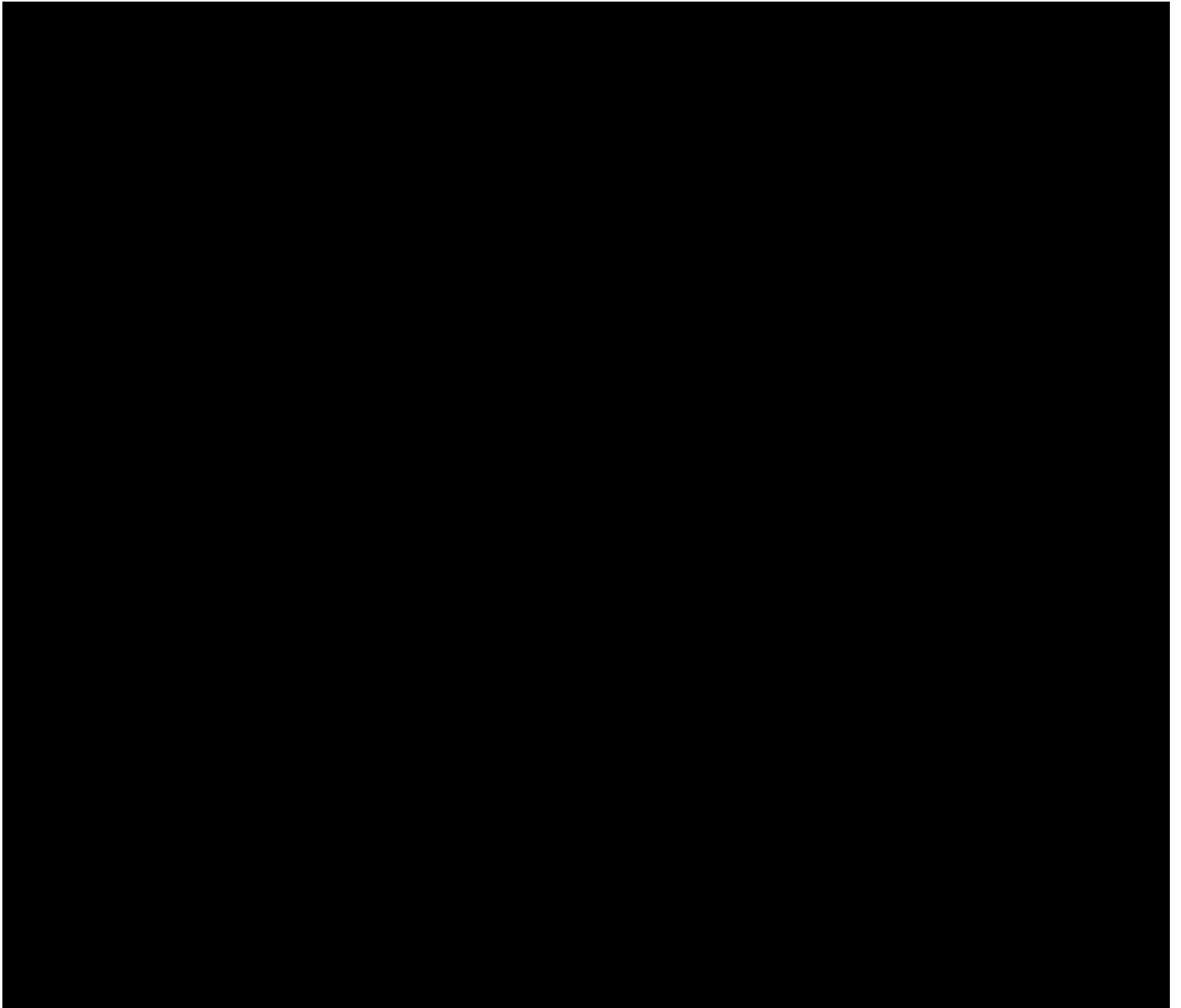
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Cleveland, Ohio 44114

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F. 216.348.5474
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Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003





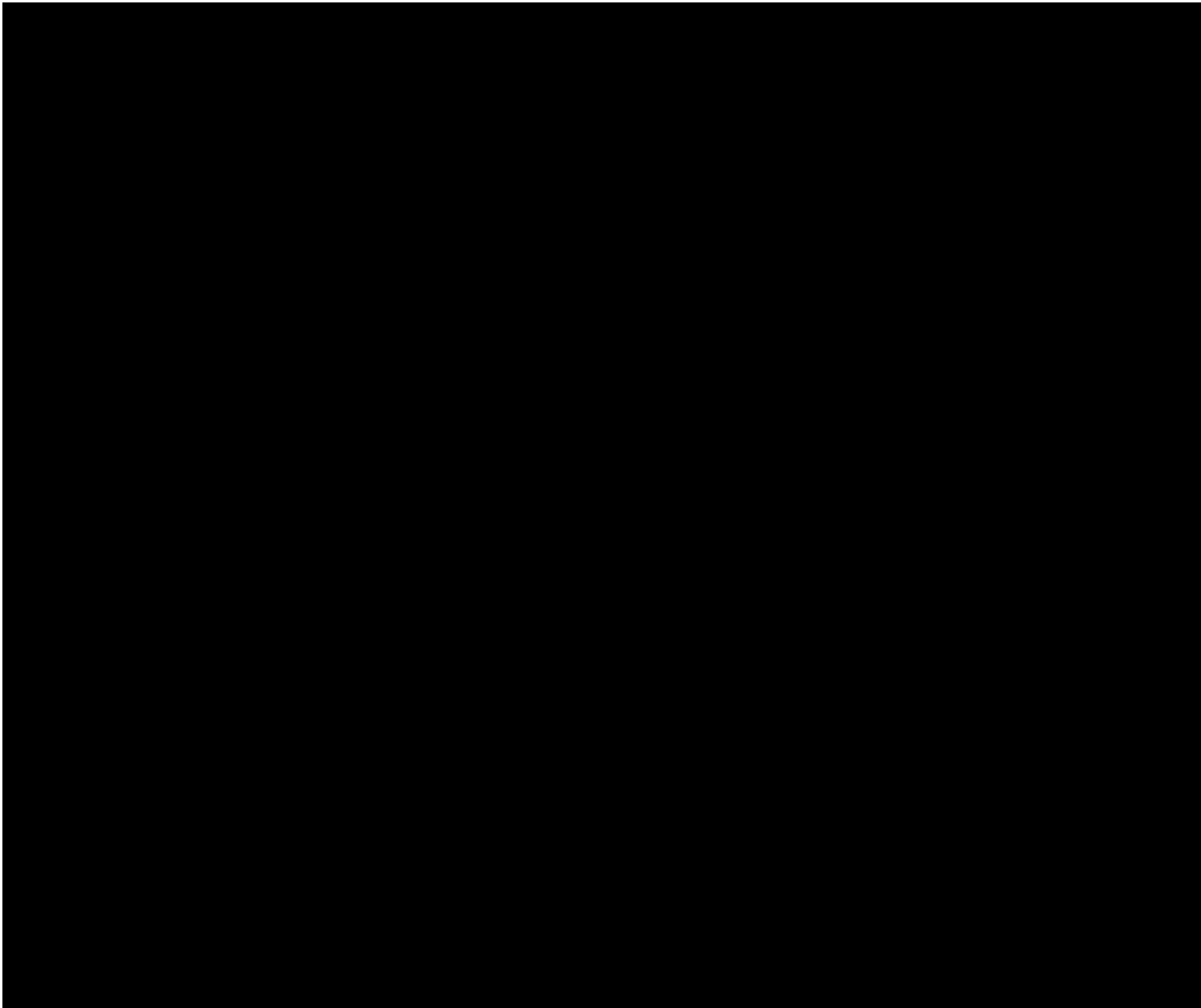
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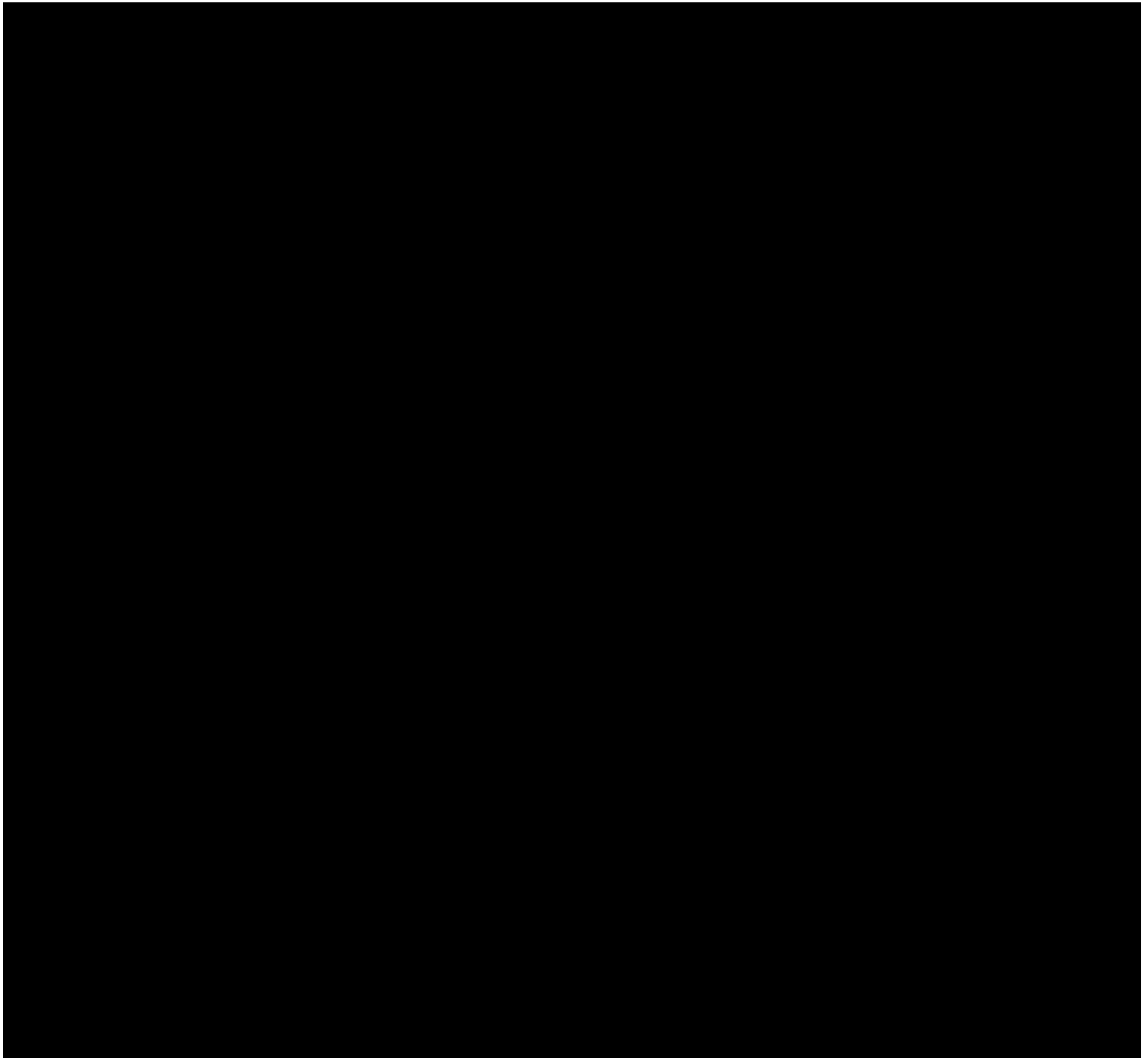
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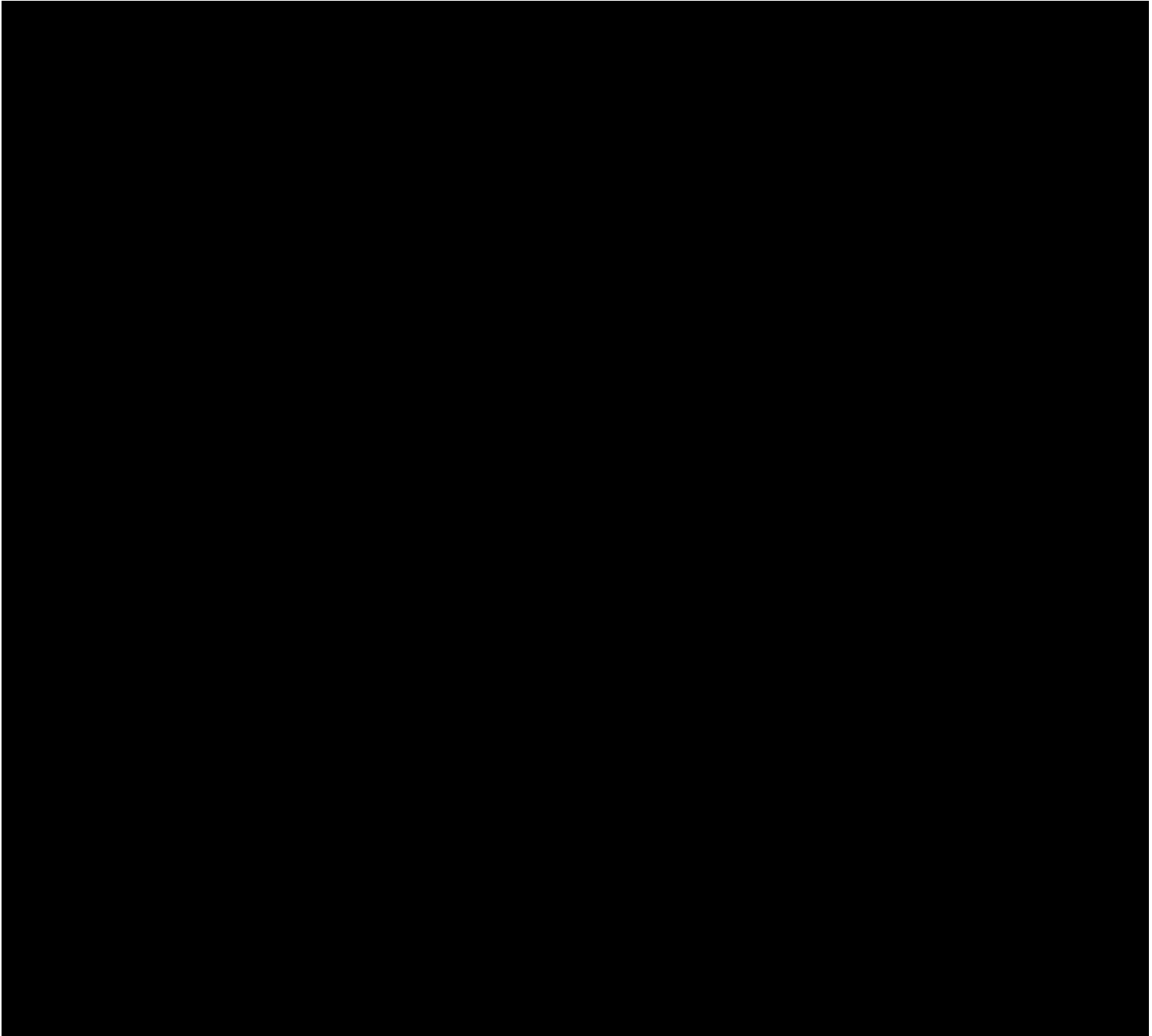
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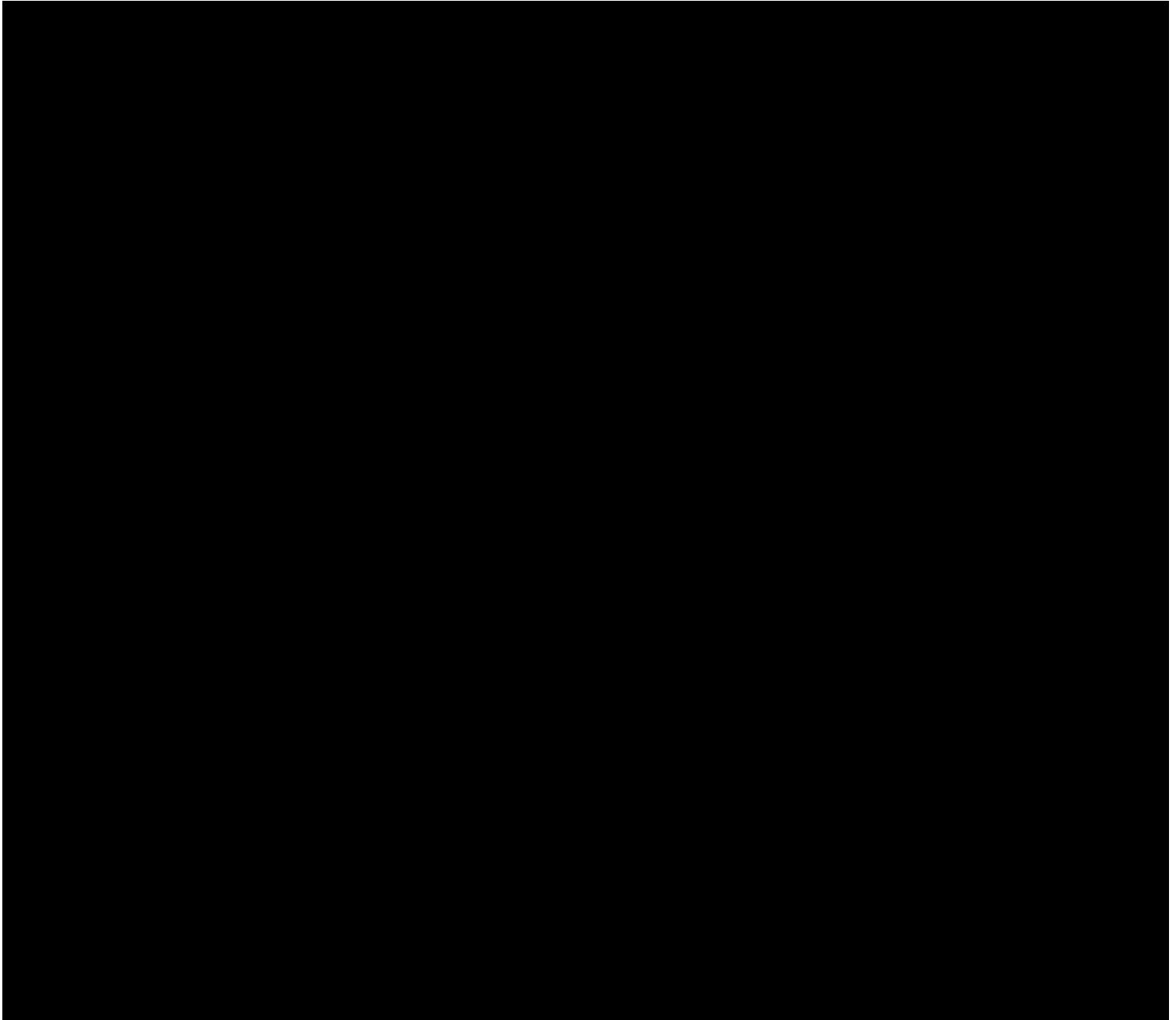
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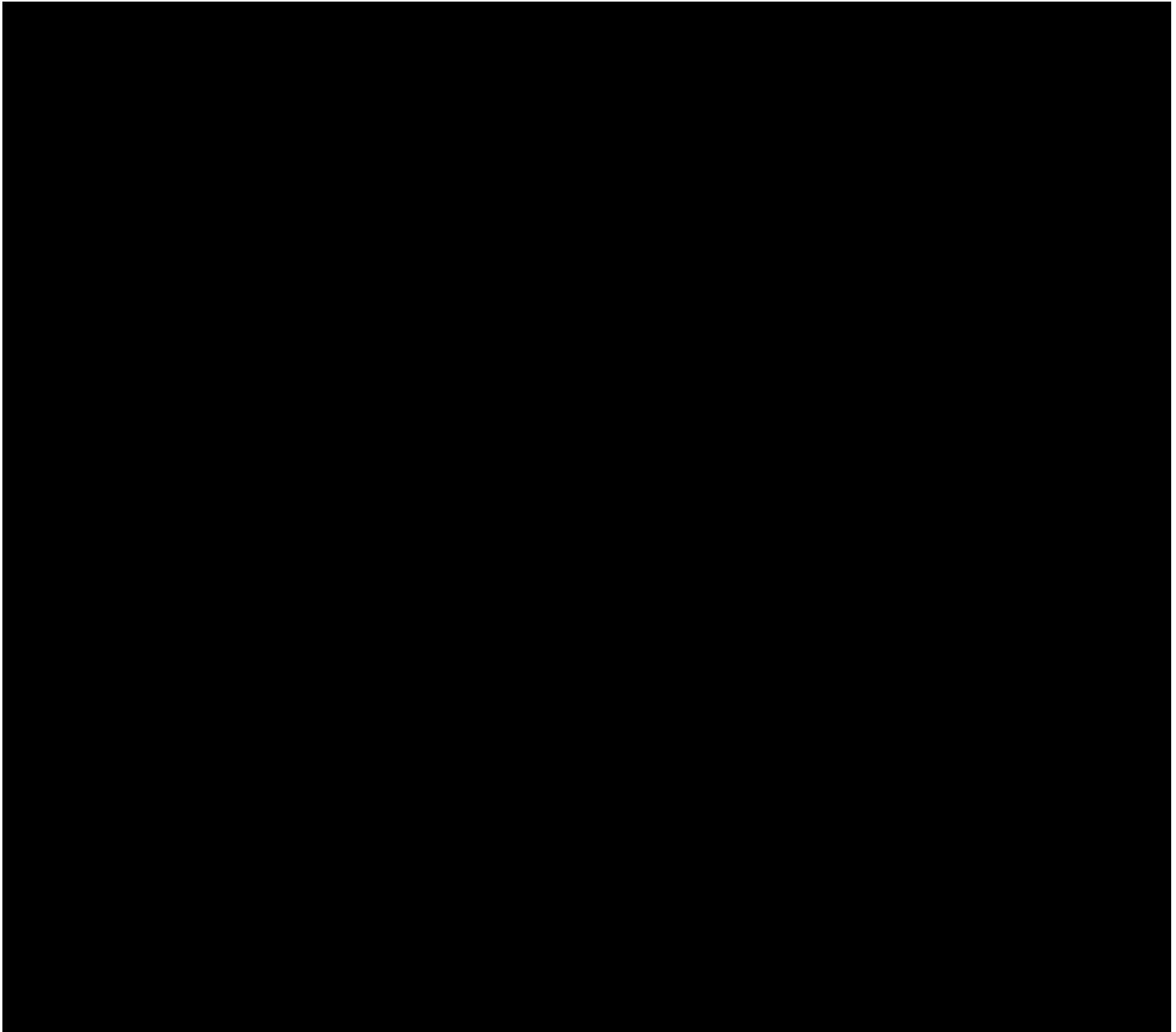
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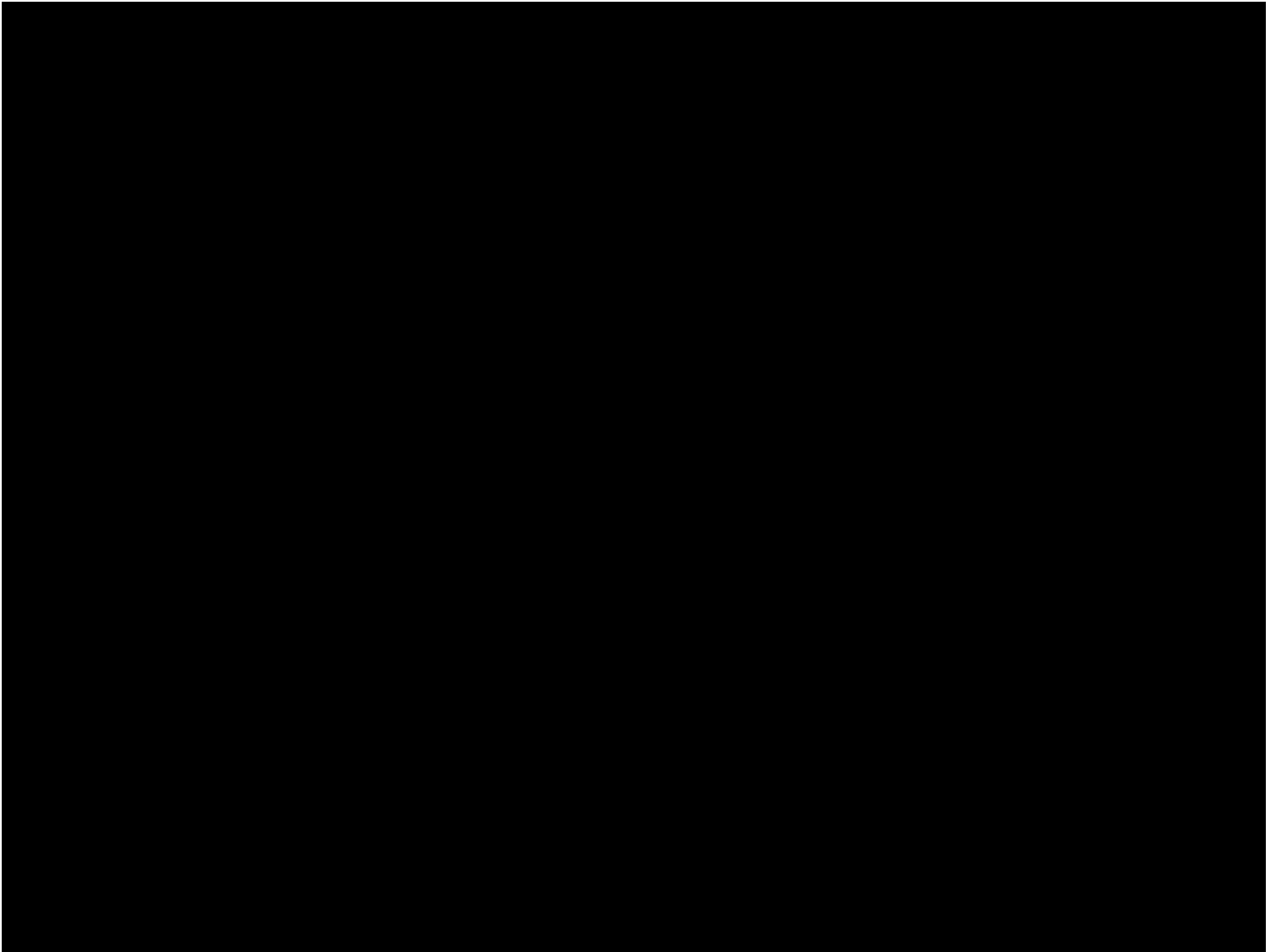
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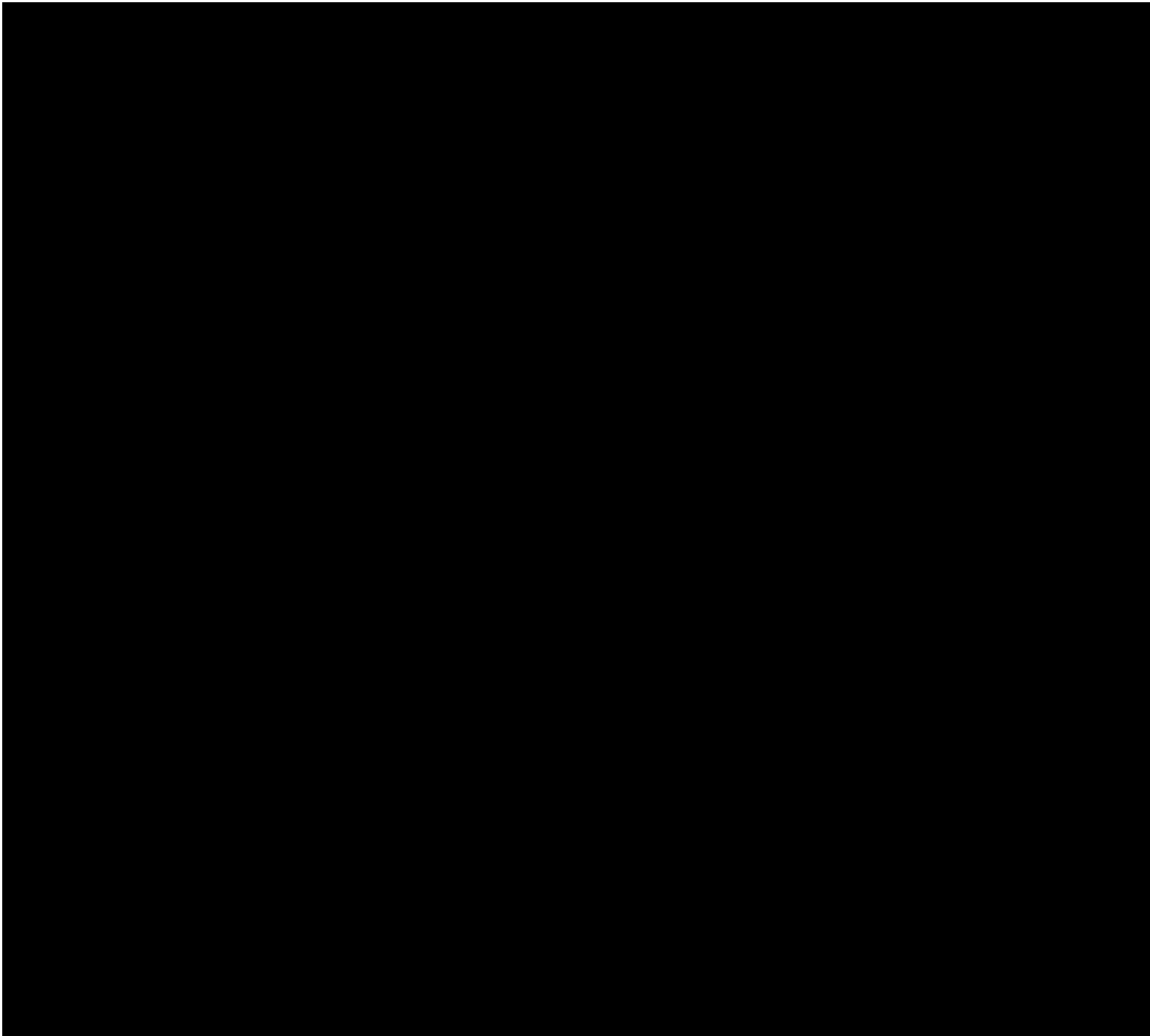
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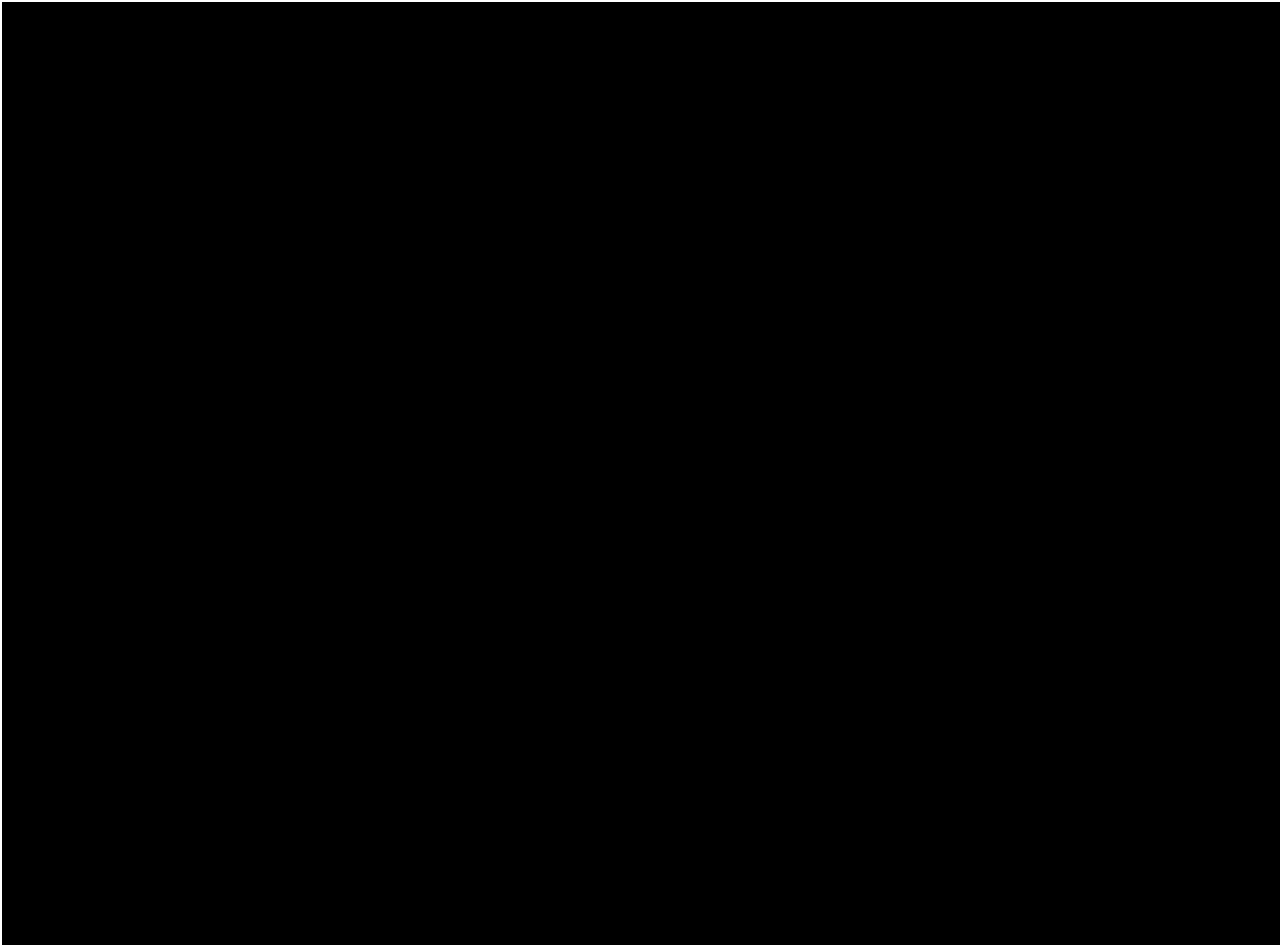
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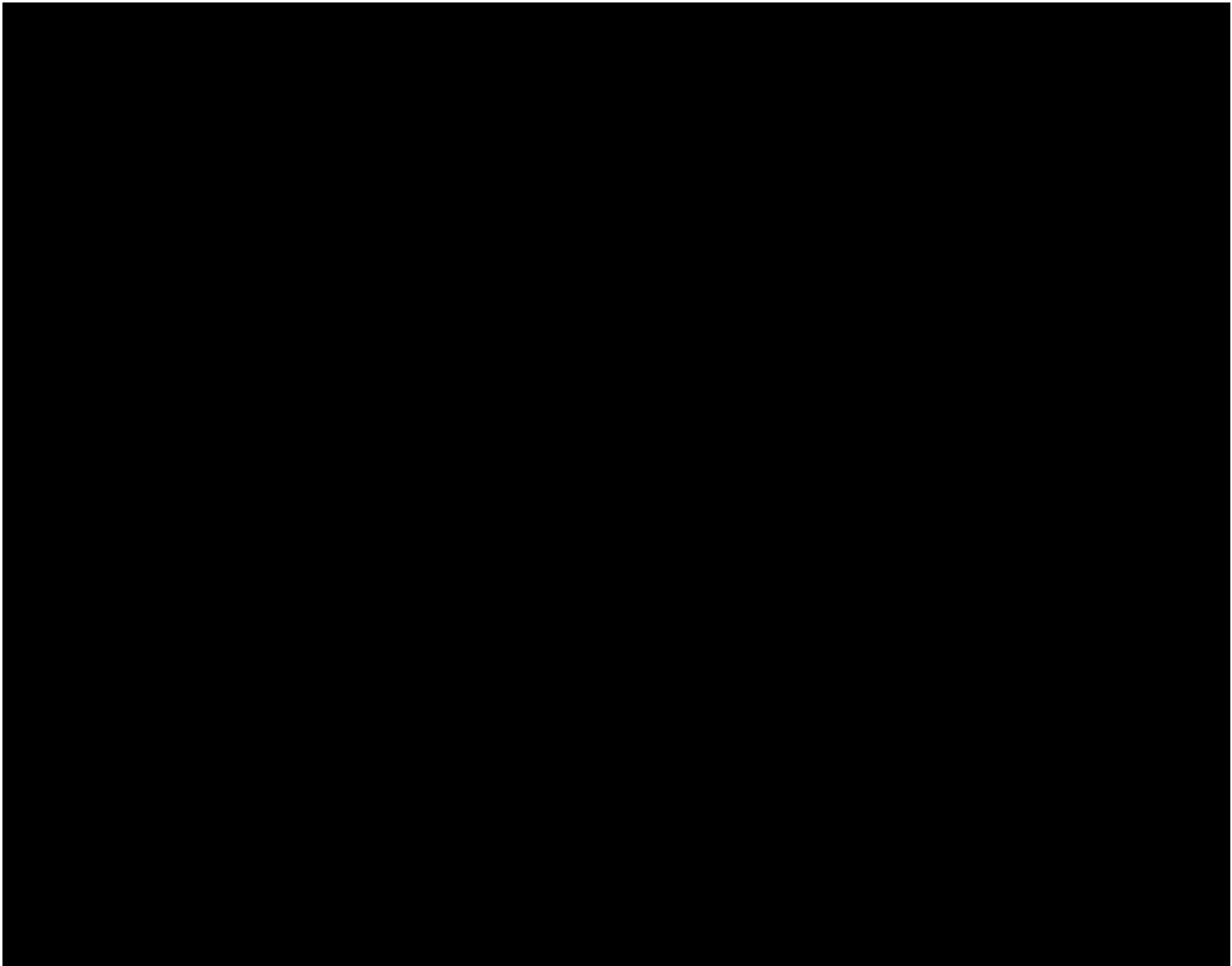
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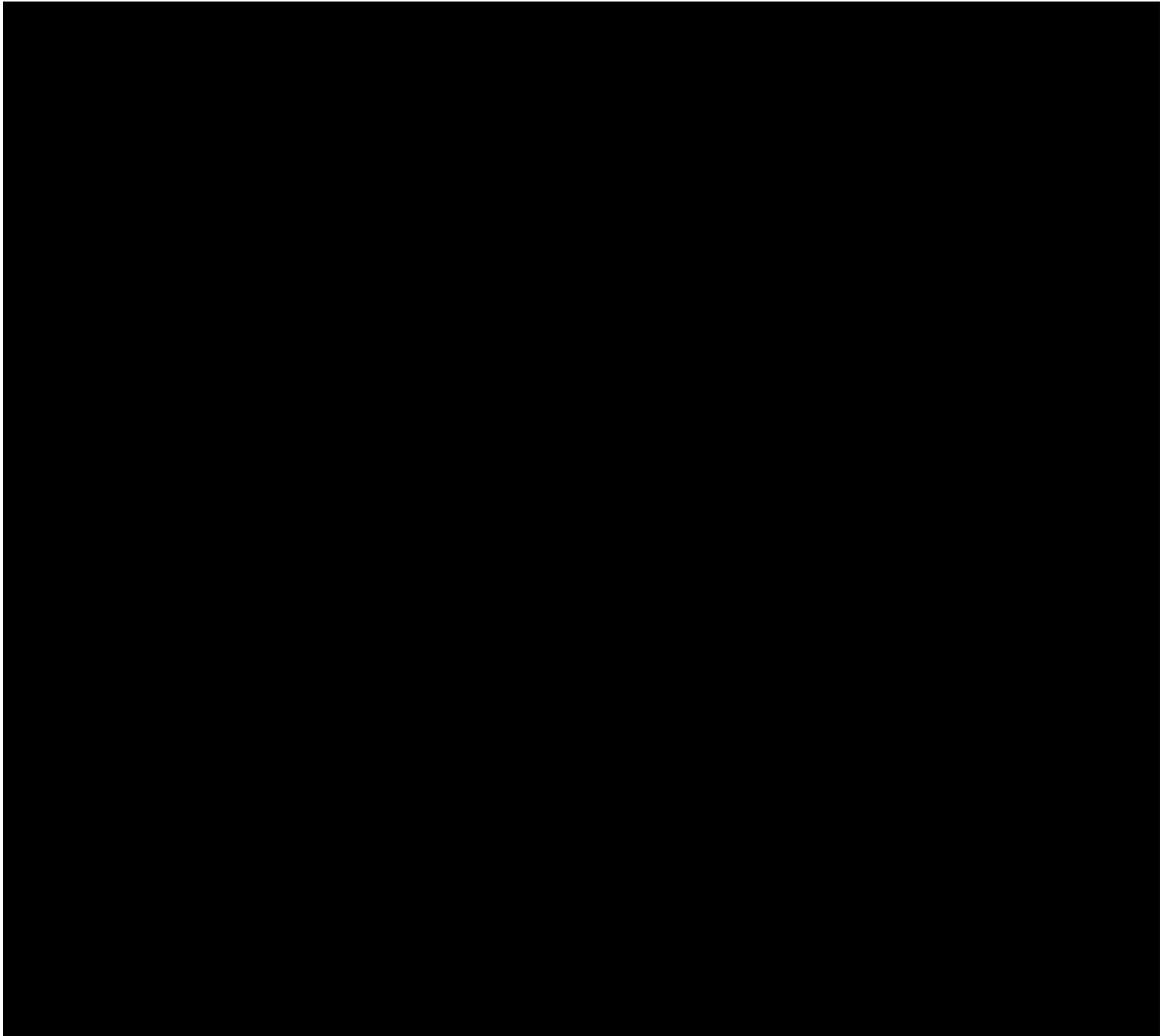
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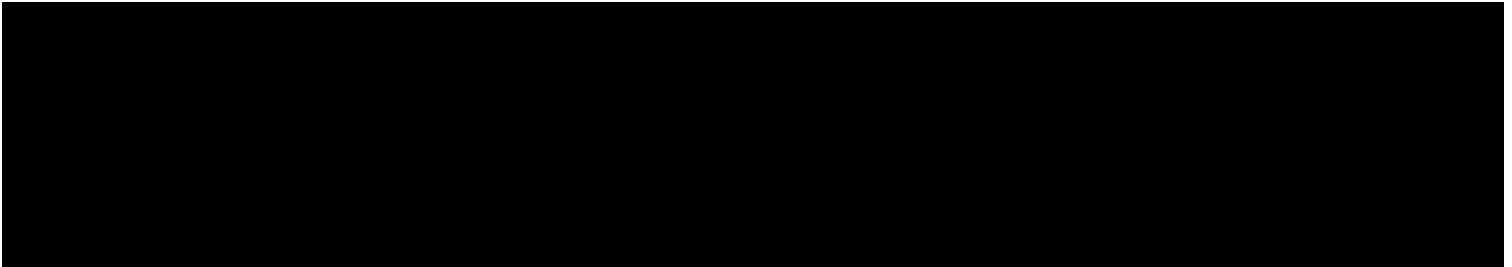
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Invoices Due Upon Receipt

TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

JUNE 16, 2020
Invoice No: 1386569

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH MAY 31, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES
EXPENSES

TOTAL

AGING OF ACCOUNT

0 - 30 DAYS	31 - 60 DAYS	61 - 90 DAYS	91 + DAYS	TOTAL
-------------	--------------	--------------	-----------	-------

PAYMENT BY WIRE TRANSFER, ACH, OR CREDIT CARD
CONTACT ACCOUNTS RECEIVABLE AT (216) 348-5445
OR MHACCOUNTING@MCDONALDHOPKINS.COM

PAYMENT BY CHECK
MCDONALD HOPKINS LLC
ATTN: ACCOUNTS RECEIVABLE
600 SUPERIOR AVE, E.
SUITE 2100
CLEVELAND, OHIO 44114



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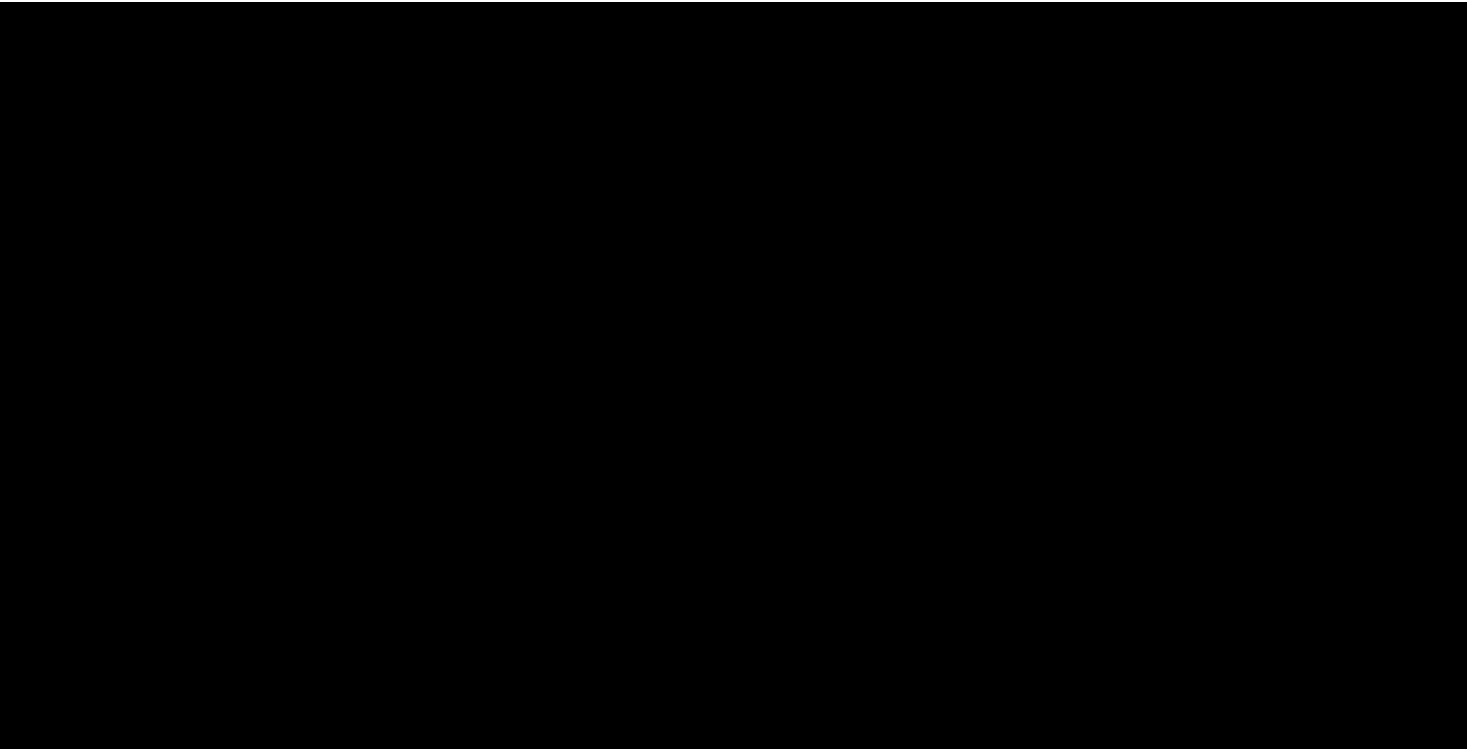
FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH MAY 31, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES

EXPENSES



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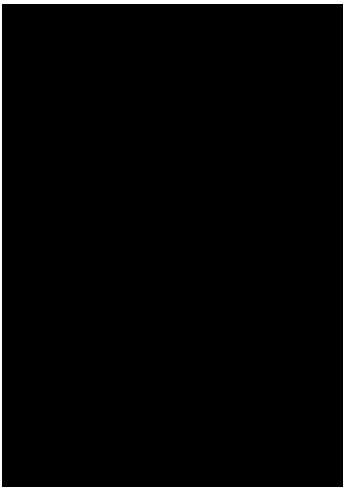
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Invoices Due Upon Receipt

TOTAL

STATEMENT OF ACCOUNT

STATEMENT DATED CURRENT
PREVIOUS BALANCE
ADJUSTMENTS OR CREDITS
TOTAL AMOUNT DUE





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Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003

05/01/20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
CONTINUE TO REVISE MOTION TO DISMISS TRADE SECRET
COMPLAINT BY MMP.

MATTHEW J CAVANAGH

~~1.40 hours at 475.00/hr 665.00~~
0.5 hours at 475.00/hr = 237.50

[REDACTED]

[REDACTED]



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RE: TERVES V. YUEYANG ET AL.
46657-00003

05/05/20 CONTINUE TO REVISE MOTION TO DISMISS MMP'S TRADE
SECRET COMPLAINT; DRAFT AND REVISE MEDIATION
STATEMENT TO SIXTH CIRCUIT FOR APPEAL.

MATTHEW J CAVANAGH 6.10 hours at 475.00/hr 2,897.50



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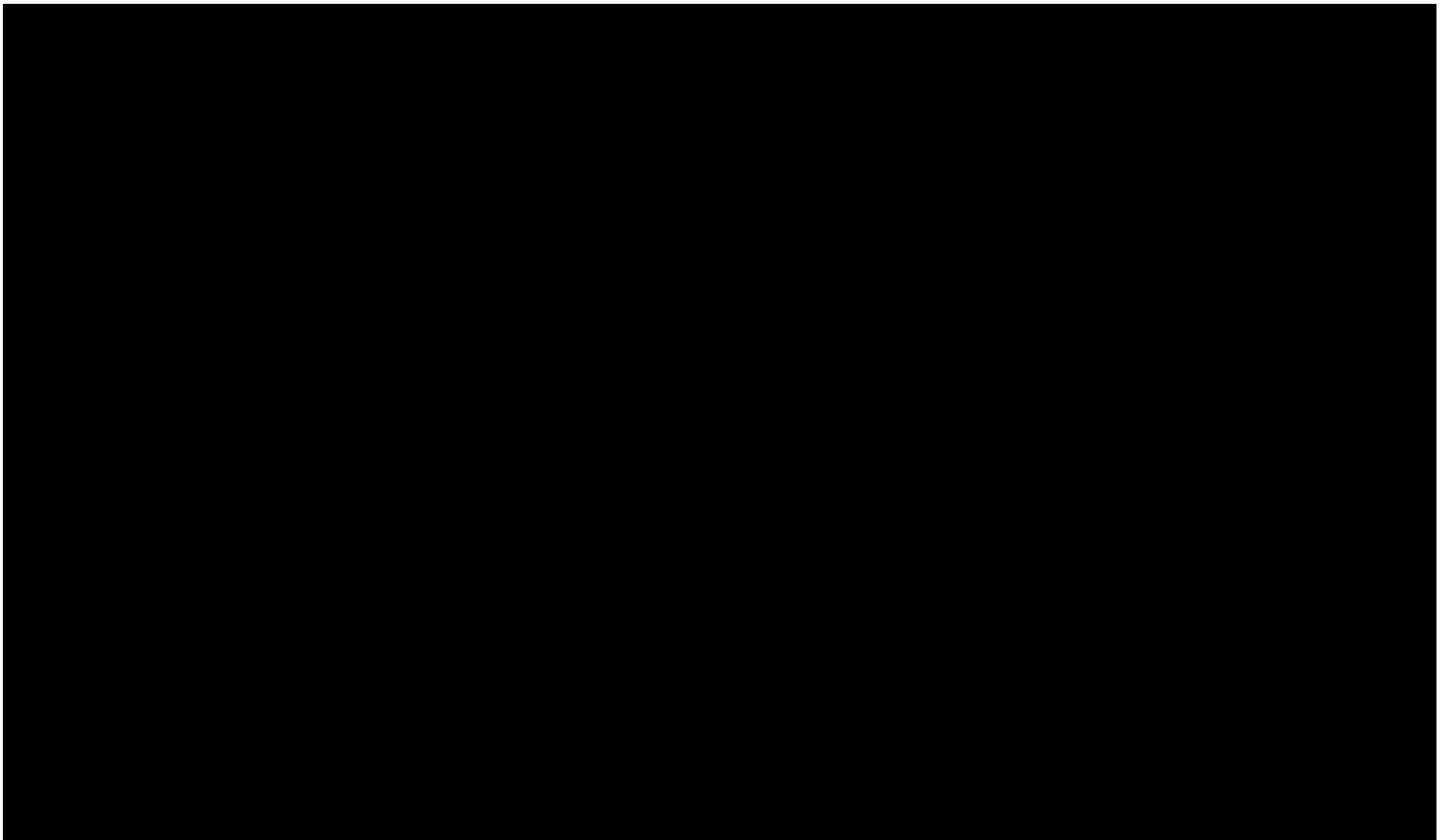
RE: TERVES V. YUEYANG ET AL.
46657-00003

05/06/20 EXCHANGE EMAILS WITH MMP'S COUNSEL REGARDING
MEDIATION MATERIALS FOR SIXTH CIRCUIT; TELECONFERENCE
WITH MMP'S COUNSEL REGARDING HIS REQUEST TO PRODUCE A
"VIDEO" OF THE TRADE SECRET AND REJECT REQUEST; EMAIL
A. SHERMAN TO UPDATE ON ECOMETAL'S REQUEST TO PRODUCE
VIDEO OF TRADE SECRET.

MATTHEW J CAVANAGH

0.80 hours at 475.00/hr

380.00





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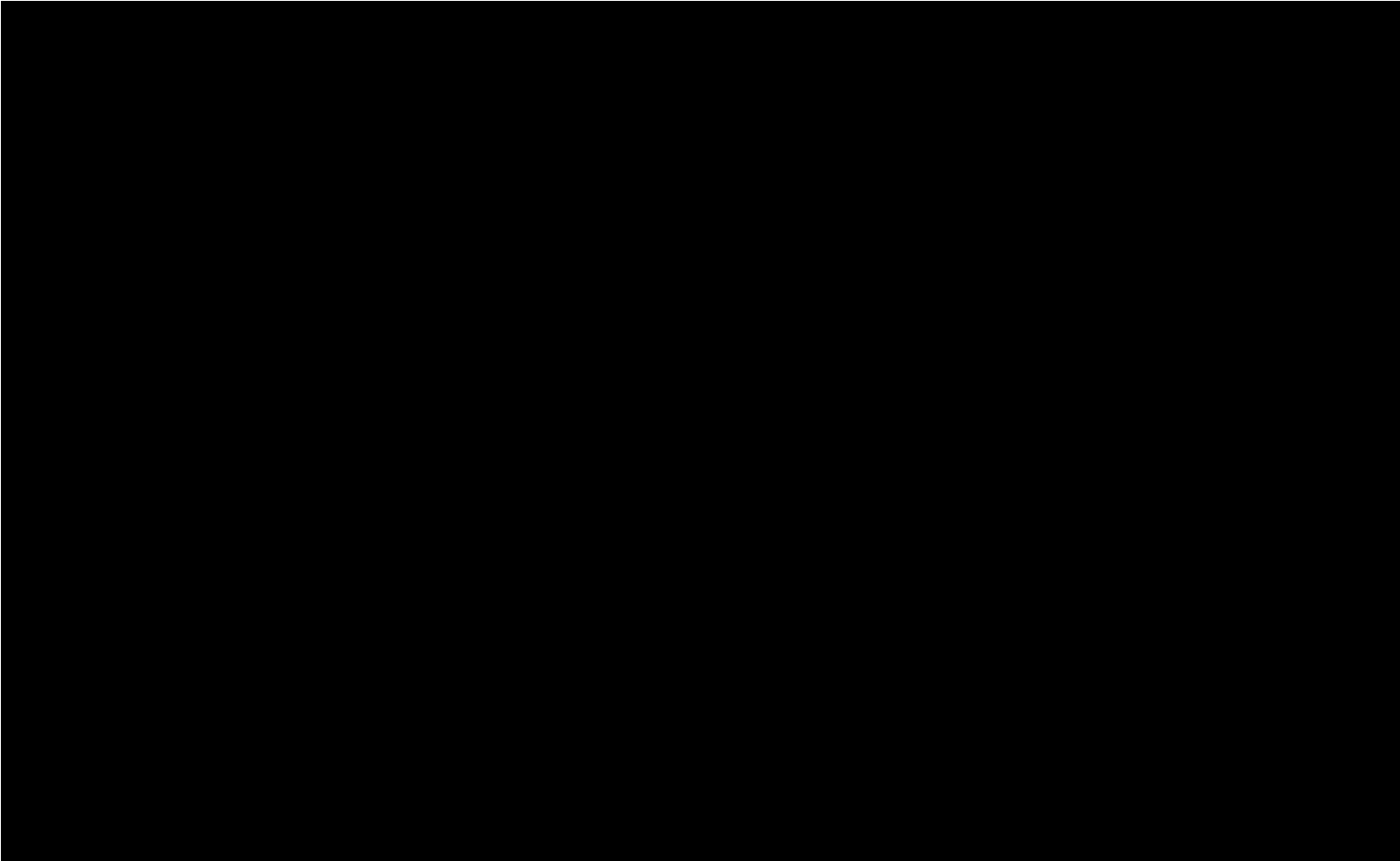
Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003

05/11/20 EDIT AND FINALIZE MOTION TO DISMISS COMPLAINT; REVIEW
LOCAL RULES REGARDING OBTAINING LEAVE TO FILE
UNREDACTED VERSION OF MEMORANDUM IN SUPPORT OF MOTION
TO DISMISS UNDER SEAL; DRAFT MOTION FOR LEAVE TO FILE
UNREDACTED MEMORANDUM UNDER SEAL; APPROVE MOTION TO
DISMISS FOR ELECTRONIC FILING.

MATTHEW J CAVANAGH

3.70 hours at 475.00/hr 1,757.50





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RE: TERVES V. YUEYANG ET AL.
46657-00003

05/13/20 DRAFT AND REVISE MOTION TO DISMISS APPEAL; ATTEND
MEDIATION BEFORE SIXTH CIRCUIT MEDIATION OFFICE;

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

MATTHEW J CAVANAGH ~~6.60 hours at 475.00/hr~~ ~~3,135.00~~
4.6 hours at 475.00/hr = 2,185.00

[REDACTED]



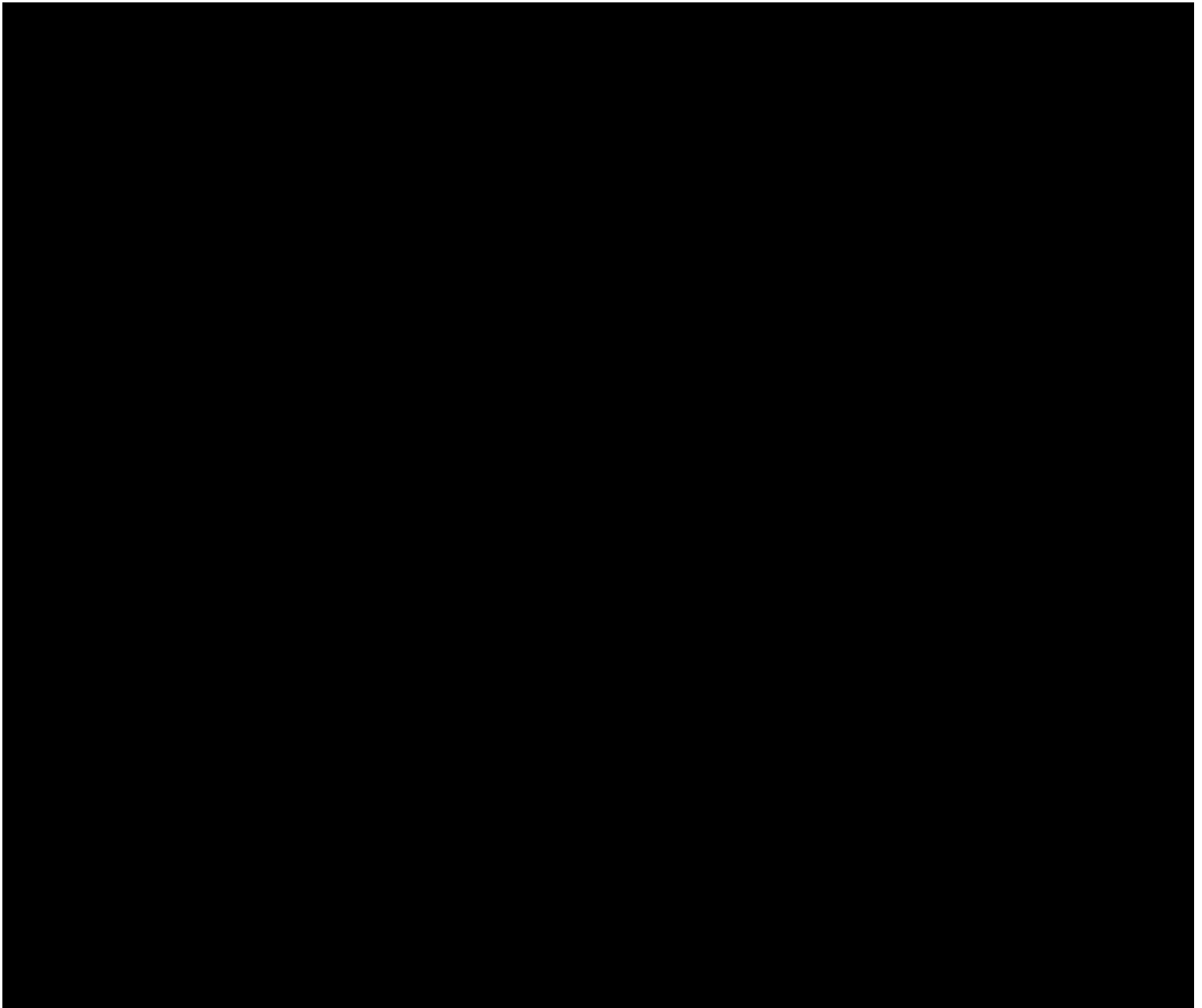
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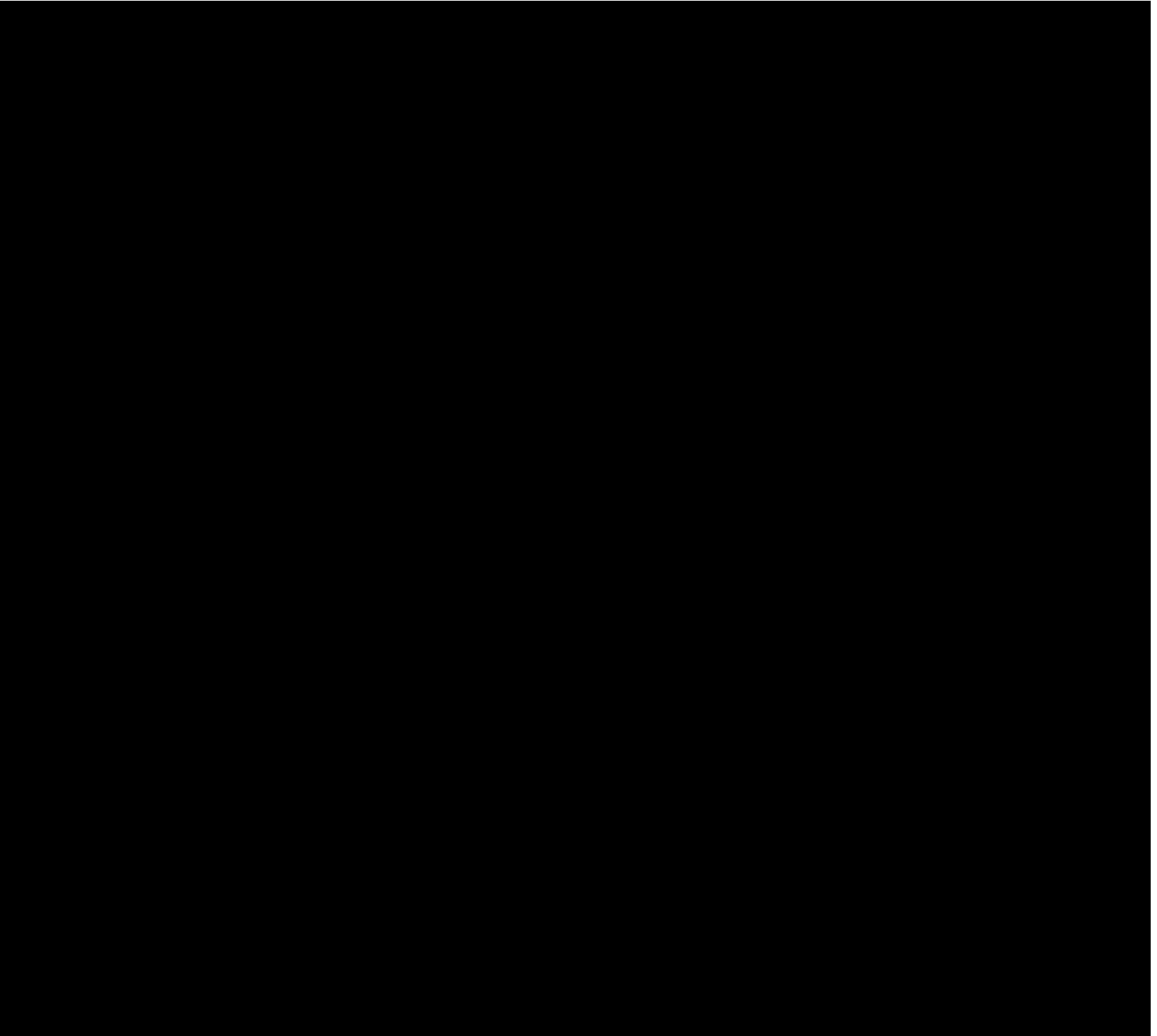
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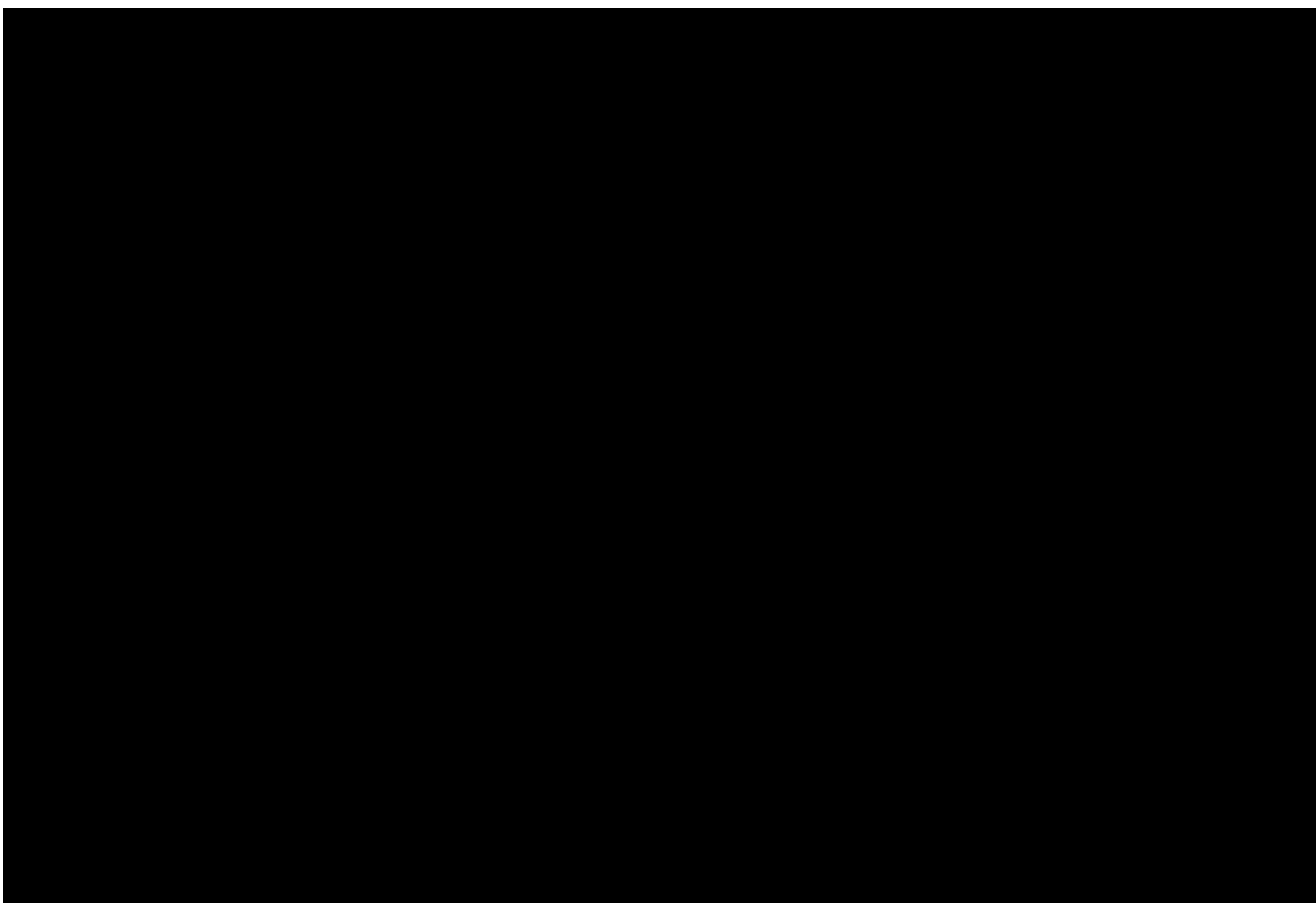
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RE: TERVES V. YUEYANG ET AL.
46657-00003



05/21/20

[REDACTED]
[REDACTED]

REVIEW

CASELAW CITED IN MMP'S OPPOSITION TO MOTION TO
DISMISS APPEAL AND EVALUATE COUNTER-ARGUMENTS TO SAME
IN PREPARATION FOR REPLY BRIEF; ANALYZE MMP'S
ARGUMENTS AS TO WHY IT MAY APPEAL IMMEDIATELY AND
DRAFT OUTLINE OF REPLY BRIEF ARGUMENTS.

MATTHEW J CAVANAGH

~~5.10 hours at 475.00/hr 2,422.50~~

1.5 hours at 475.00/hr =712.50



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RE: TERVES V. YUEYANG ET AL.
46657-00003

05/22/20

[REDACTED]
[REDACTED]
[REDACTED] DRAFT OUTLINE OF REPLY BRIEF IN SUPPORT
OF MOTION TO DISMISS APPEAL; CONTINUE TO REVIEW
CASELAW CITED IN MMP'S OPPOSITION TO MOTION TO
DISMISS APPEAL; PERFORM LEGAL RESEARCH TO FIND
ADDITIONAL CASELAW FOR WHY APPEAL OF EX PARTE SEIZURE
ORDER SHOULD NOT BE ALLOWED; [REDACTED]

MATTHEW J CAVANAGH

~~5.90 hours at 475.00/hr 2,802.50~~

1.8 hours at 475.00/hr = 855.00



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RE: TERVES V. YUEYANG ET AL.
46657-00003

05/26/20 REVIEW CASELAW CITED IN MMP'S OPPOSITION TO MOTION TO DISMISS APPEAL AND DRAFT ARGUMENTS DISTINGUISHING SAME; PERFORM LEGAL RESEARCH REGARDING NON-BINDING NATURE OF "UNPUBLISHED" SIXTH CIRCUIT DECISIONS CITED BY MMP; DRAFT AND REVISE REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS MMP'S APPEAL; FINALIZE REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS APPEAL AND APPROVE SAME FOR ELECTRONIC FILING; [REDACTED]

[REDACTED]

MATTHEW J CAVANAGH ~~8.30 hours at 475.00/hr 3,942.50~~
6.0 hours at 475.00/hr = 2,850.00

05/27/20 CONTINUE TO DRAFT AND REVISE REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS MMP'S APPEAL; FINALIZE REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS APPEAL AND APPROVE SAME FOR ELECTRONIC FILING.

MATTHEW J CAVANAGH 5.10 hours at 475.00/hr 2,422.50



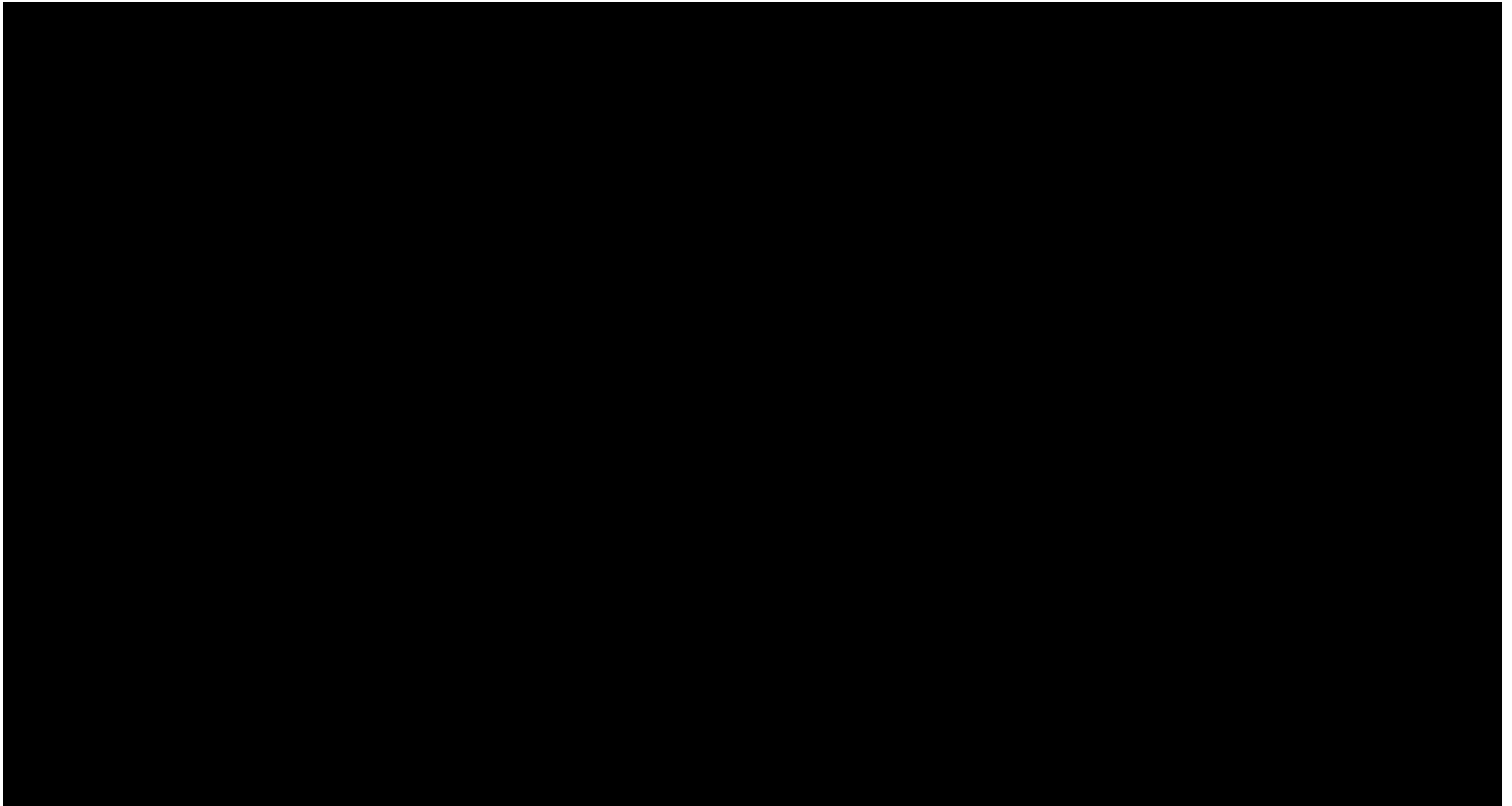
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Invoices Due Upon Receipt

TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

JULY 21, 2020
Invoice No: 1389252

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH JUNE 30, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES
COURTESY DISCOUNT
EXPENSES

TOTAL

AGING OF ACCOUNT

0 - 30 DAYS	31 - 60 DAYS	61 - 90 DAYS	91 + DAYS	TOTAL

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JULY 21, 2020
Invoice No: 1389252

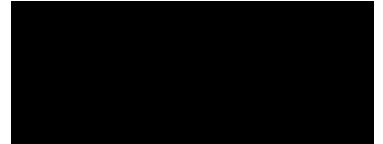
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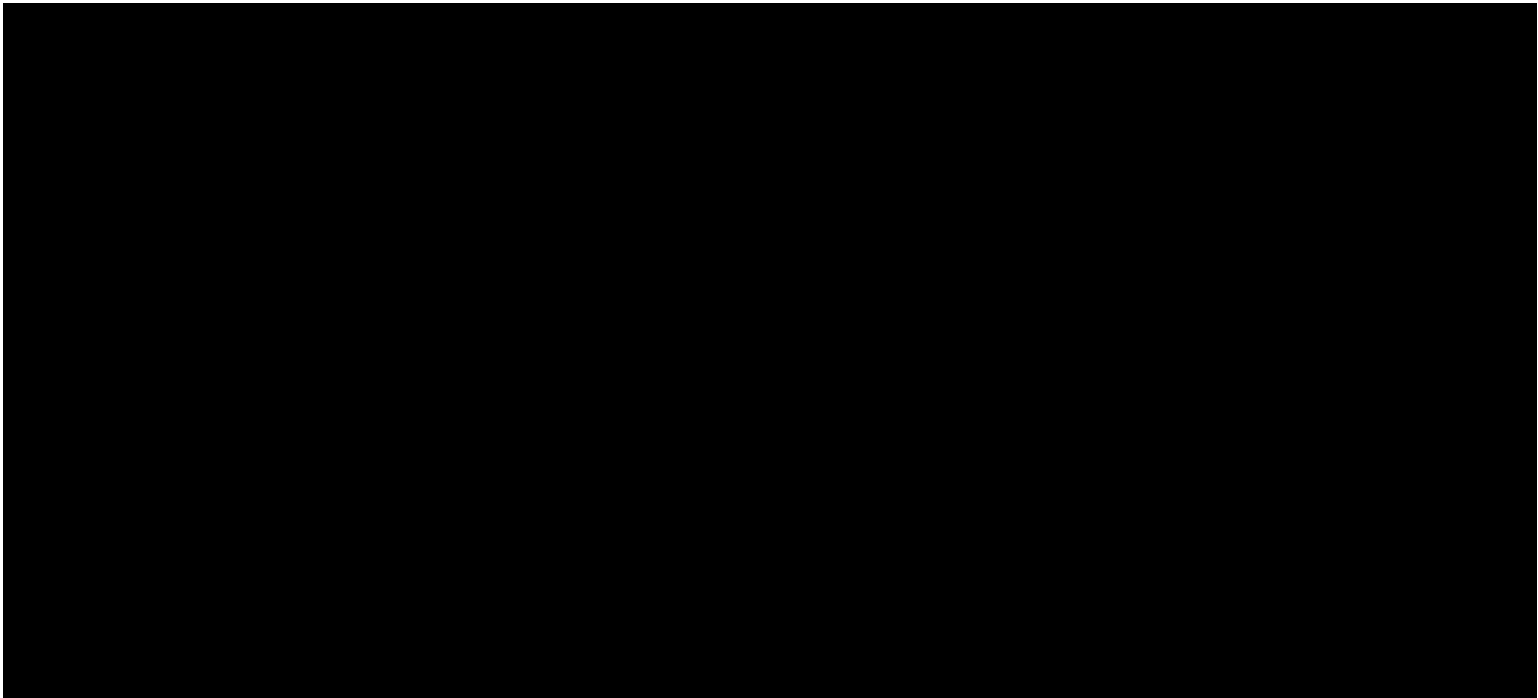
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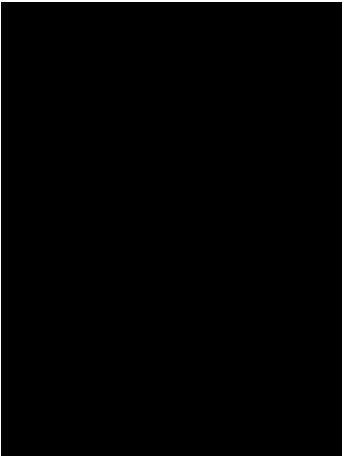
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Invoices Due Upon Receipt

TOTAL

STATEMENT OF ACCOUNT

STATEMENT DATED CURRENT
PREVIOUS BALANCE
ADJUSTMENTS OR CREDITS
TOTAL AMOUNT DUE





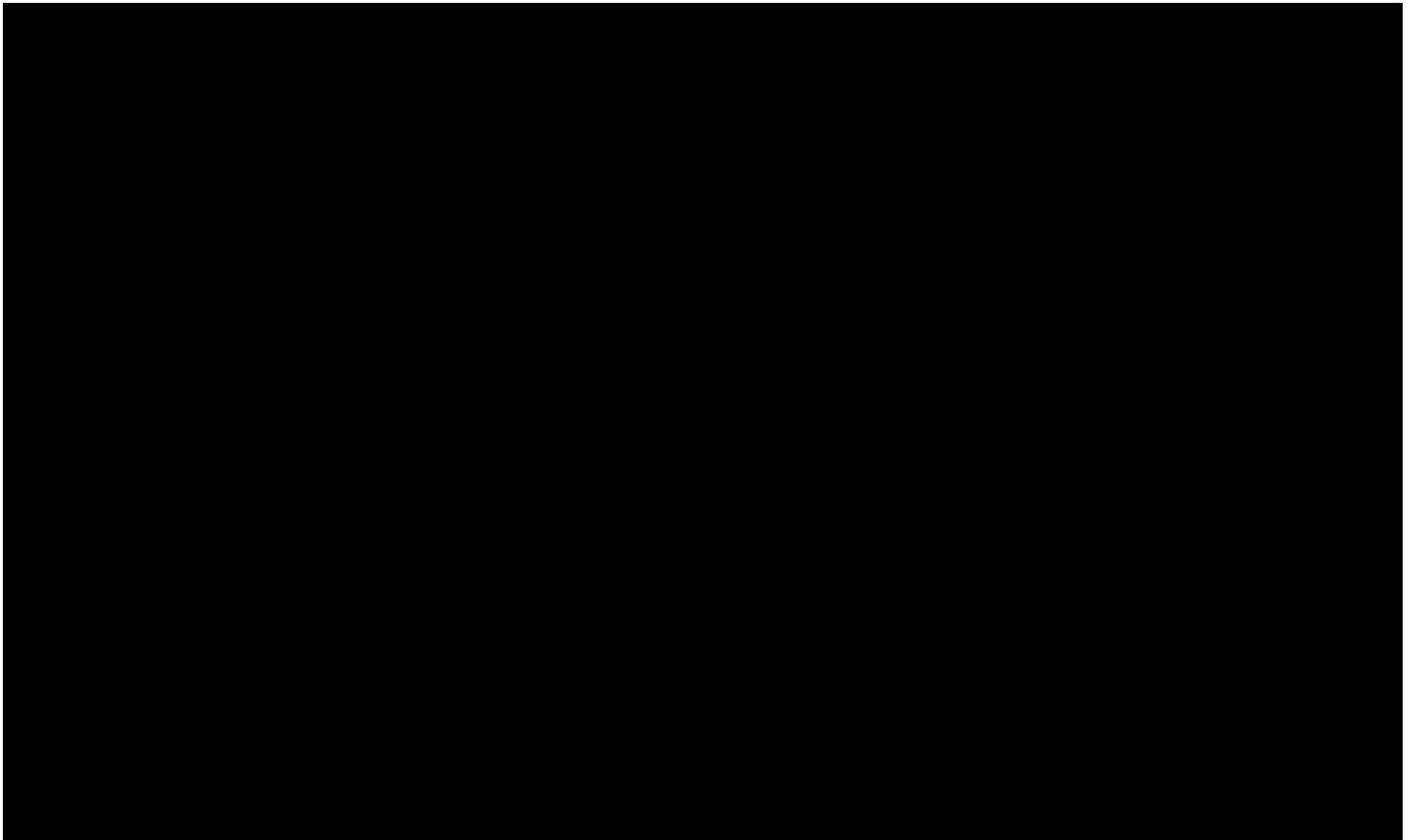
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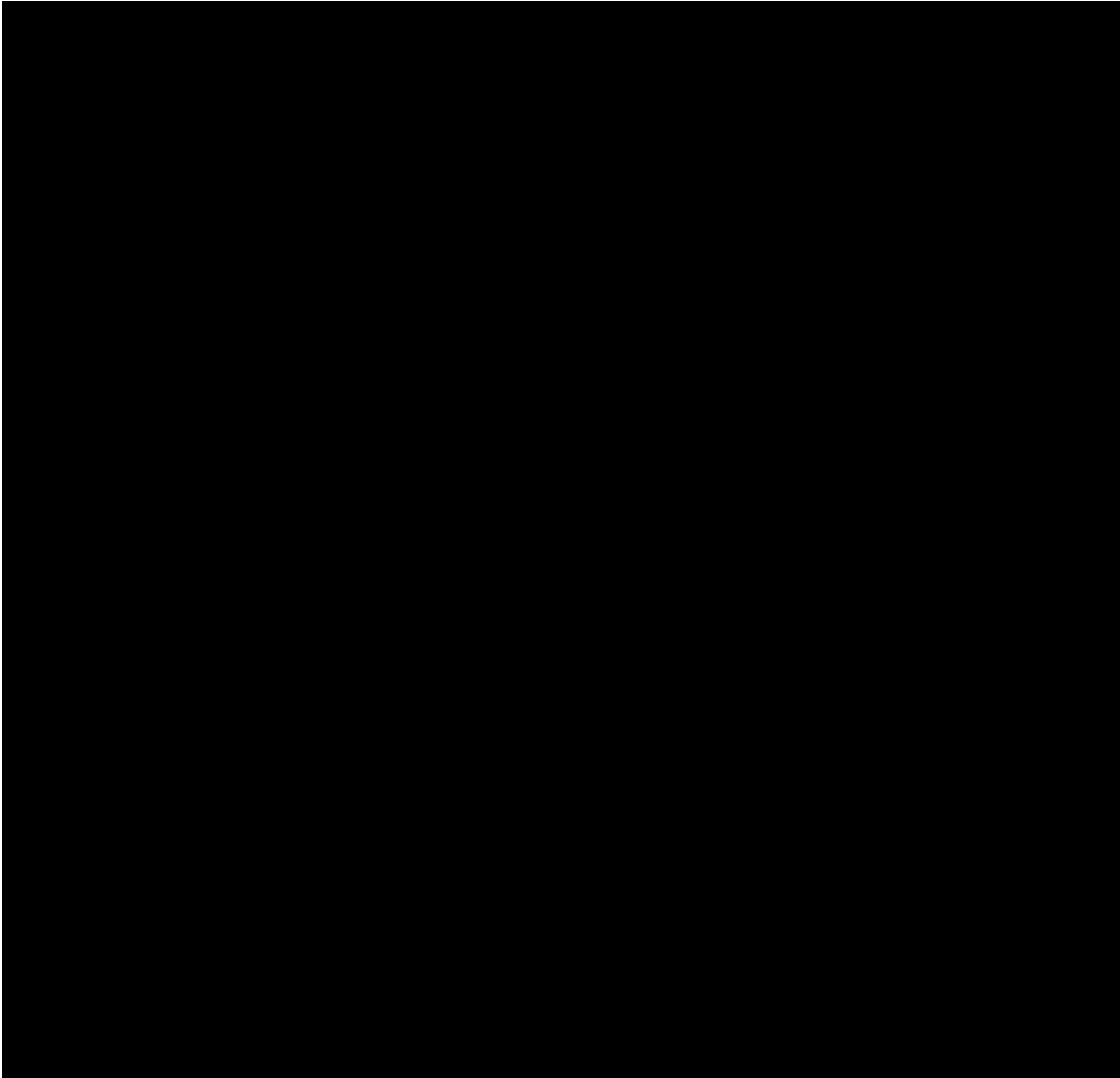
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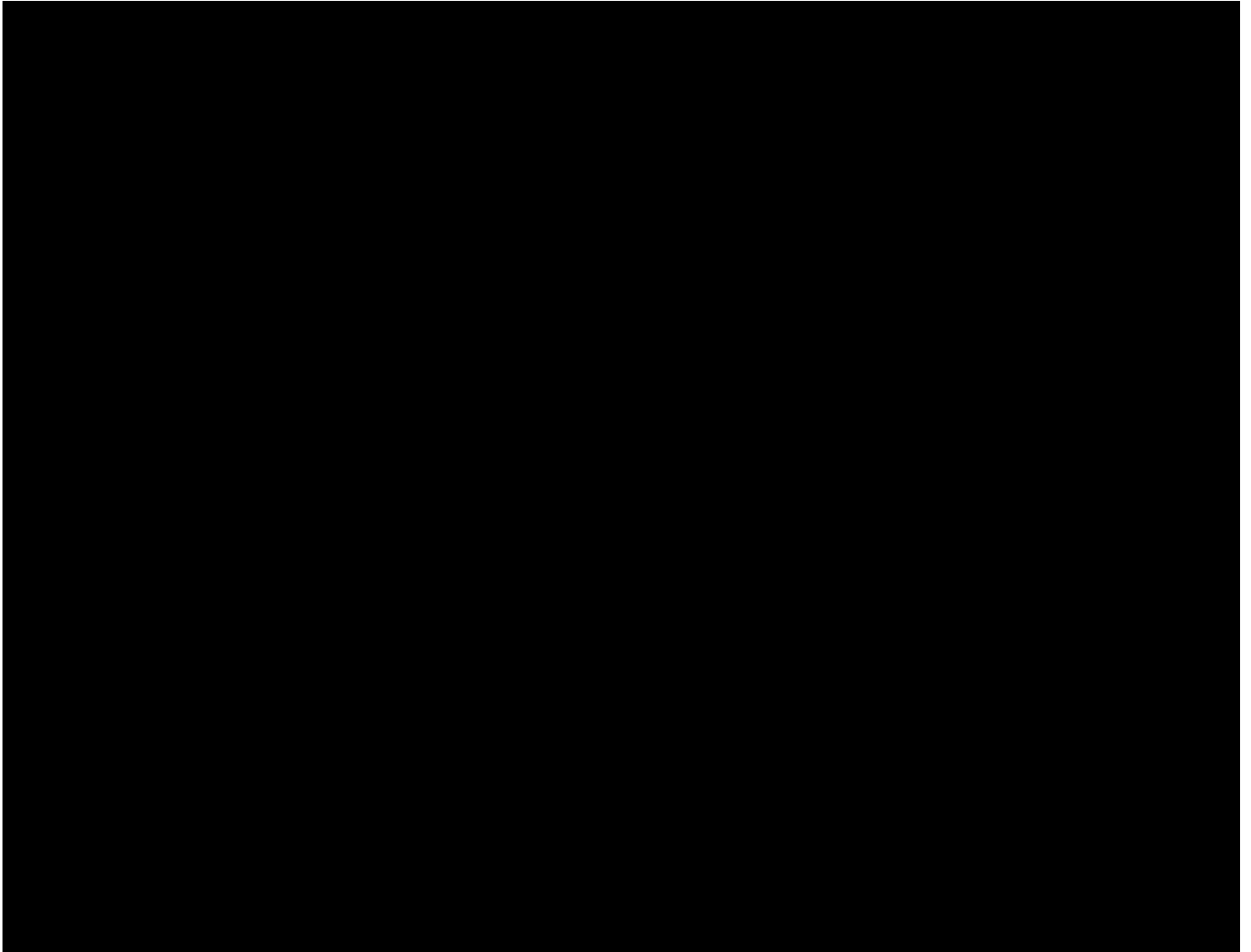
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Fed. ID 34-1059058

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Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003





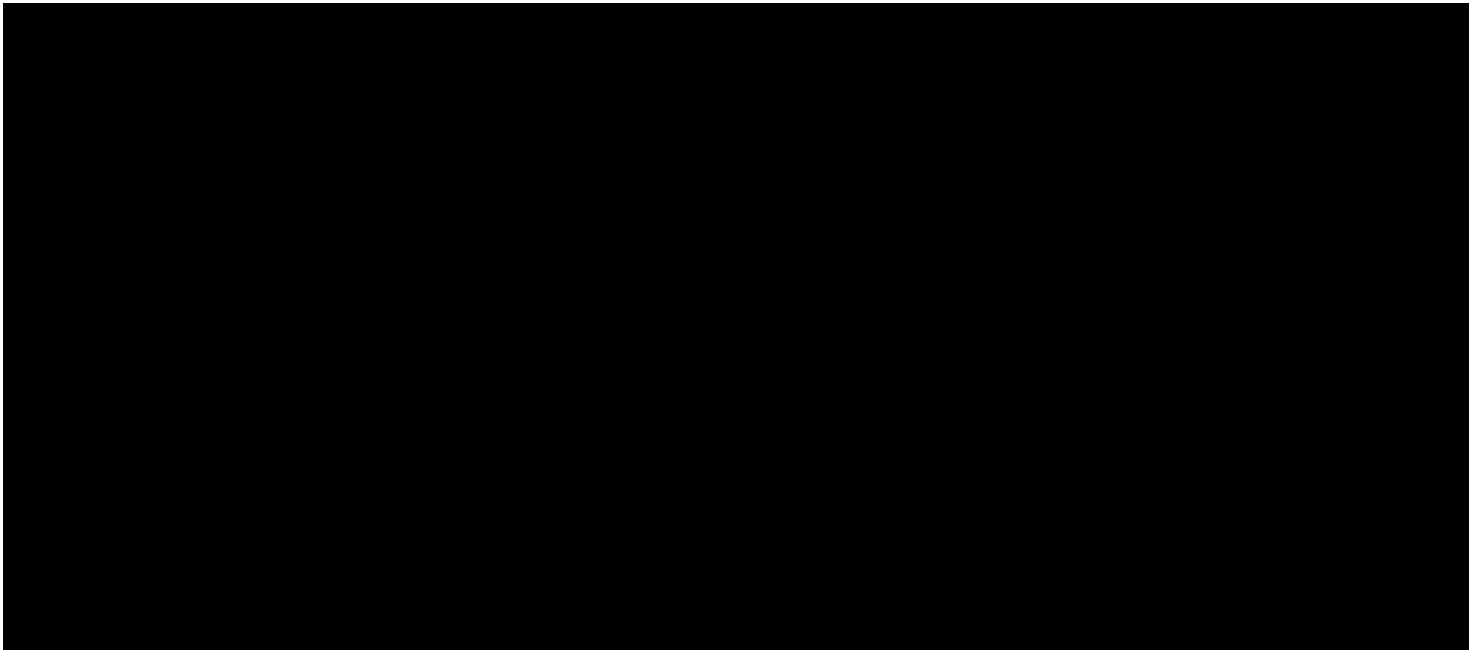
McDonald Hopkins LLC
Suite 2100
600 Superior Avenue, E
Cleveland, Ohio 44114

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F. 216.348.5474
mcdonalddhopkins.com
Fed. ID 34-1059058

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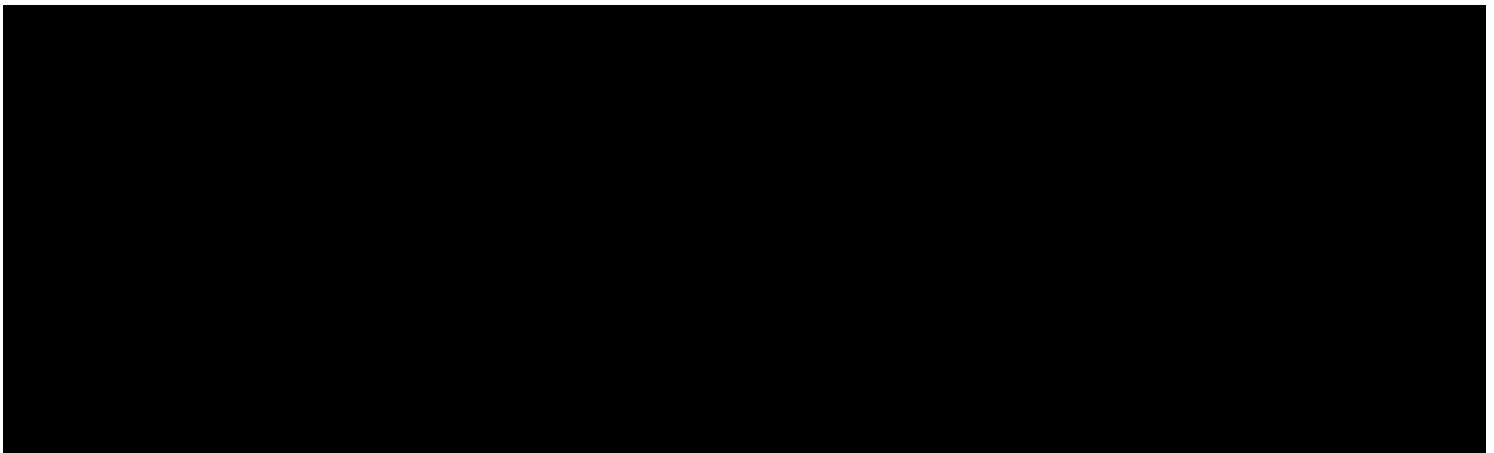
Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003



06/10/20 REVIEW AND EVALUATE MMP'S OPPOSITION TO MOTION TO
DISMISS AND BEGIN PLANNING REPLY BRIEF.

MATTHEW J CAVANAGH 1.40 hours at 475.00/hr 665.00





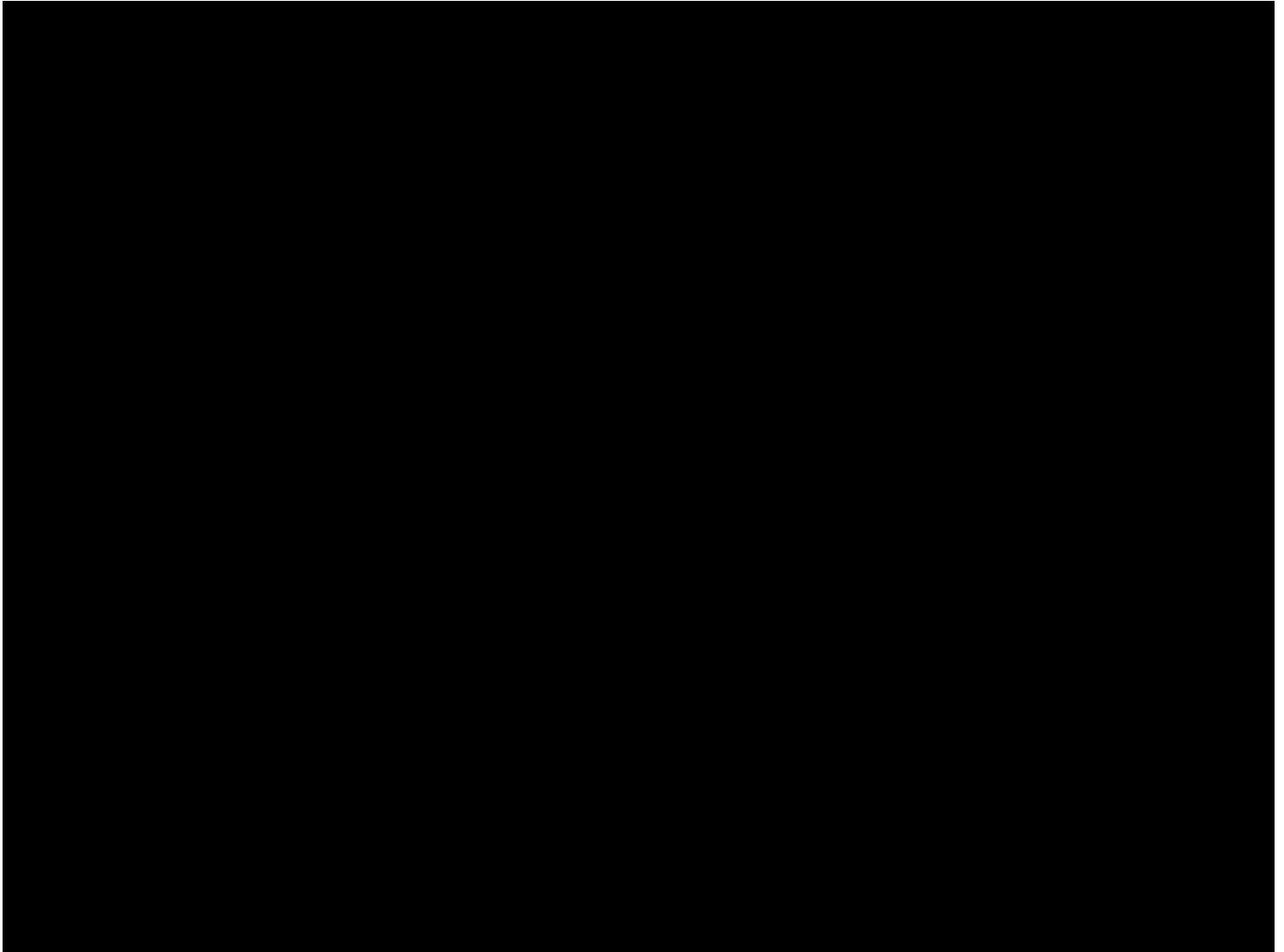
McDonald Hopkins LLC
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46657-00003





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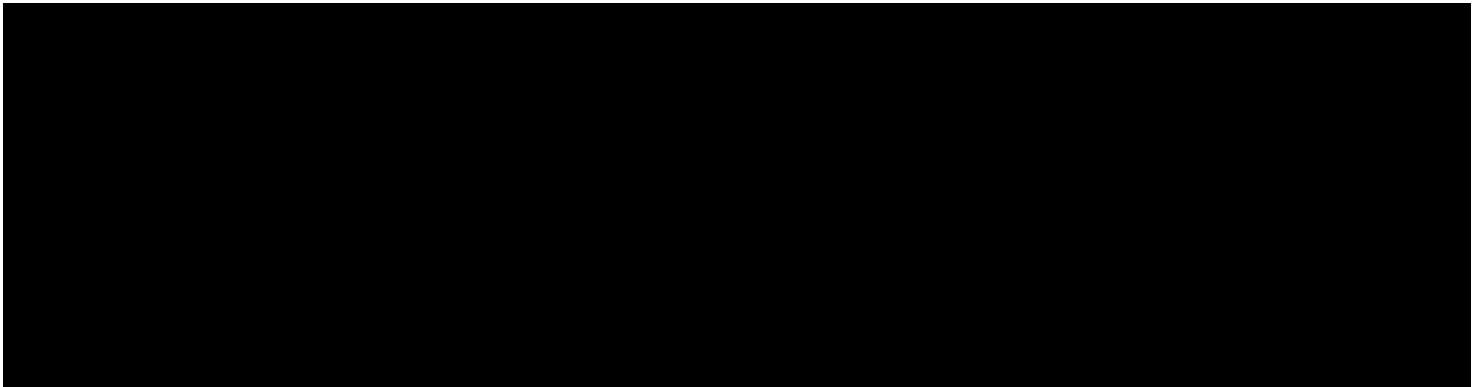
RE: TERVES V. YUEYANG ET AL.
46657-00003

06/22/20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] PREPARE TALKING POINT OUTLINE FOR STATUS
CONFERENCE IN MMP TRADE SECRET CASE BEFORE JUDGE
NUGENT; ATTEND STATUS CONFERENCE IN TRADE SECRET CASE
BEFORE JUDGE NUGENT; TELECONFERENCE WITH ATTORNEY FOR
MCDONALD HOPKINS TO DISCUSS OUTCOME OF STATUS
CONFERENCE AND REPLY BRIEF STRATEGY; [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] REVIEW AND ANALYZE MMP'S
OPPOSITION TO MOTION TO DISMISS TRADE SECRET CASE.

MATTHEW J CAVANAGH

~~3.70 hours at 475.00/hr~~ ~~1,757.50~~
2.7 hours at 475.00/hr = 1,282.50





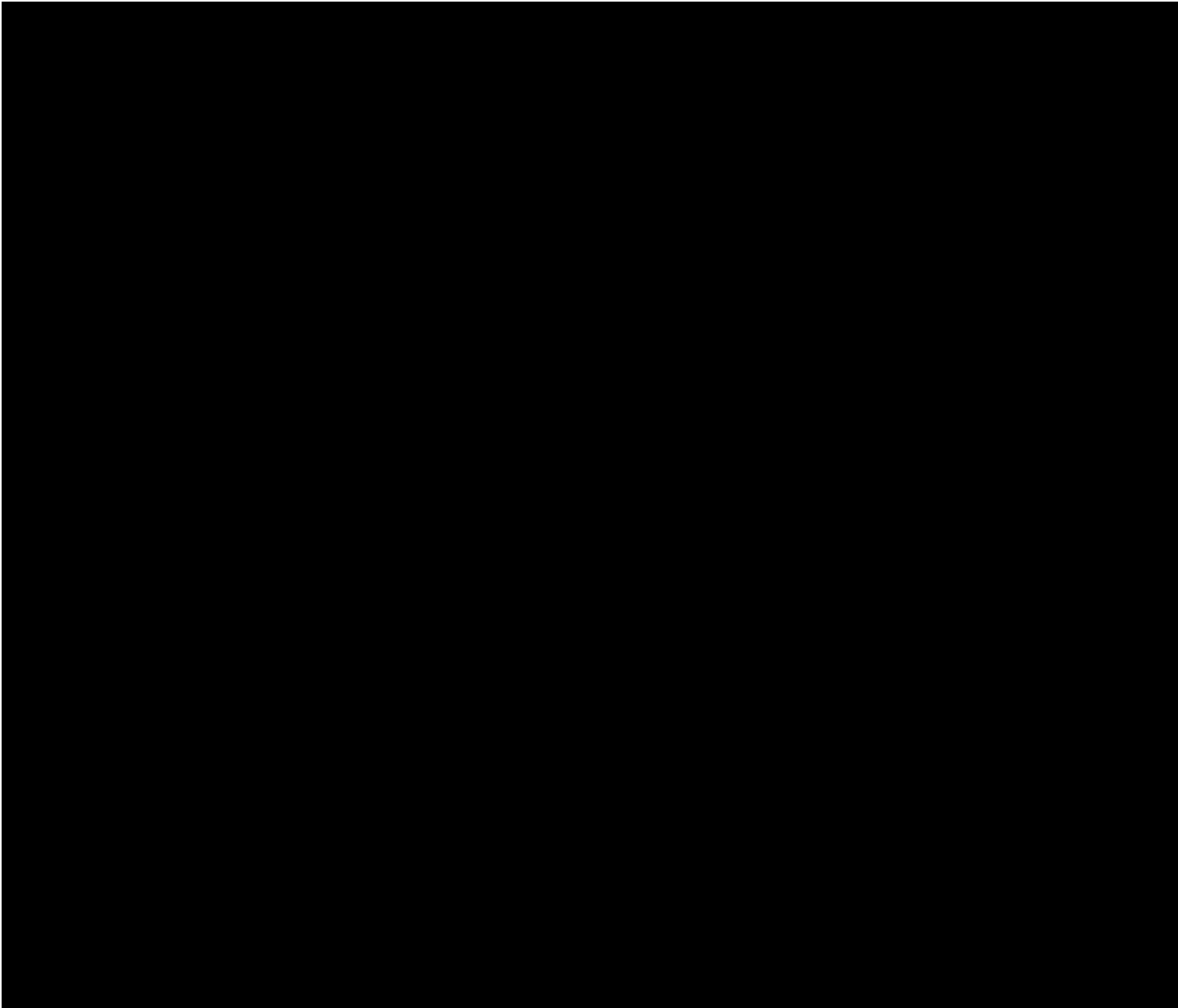
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RE: TERVES V. YUEYANG ET AL.
46657-00003

06/29/20 READ AND ANALYZE CASELAW CITED IN MMP'S OPPOSITION TO
MOTION TO DISMISS AND DEVELOP ARGUMENTS TO
DISTINGUISH AND RESPOND TO THAT CASELAW; DRAFT
OUTLINE OF REPLY BRIEF IN SUPPORT OF MOTION TO
DISMISS TRADE SECRET CASE; REVIEW CURRENT DRAFT OF
MCDONALD HOPKINS' REPLY BRIEF AND TELECONFERENCE WITH
MCDONALD HOPKINS' ATTORNEY ABOUT BRIEF AND CASELAW
CITED THEREIN.

MATTHEW J CAVANAGH

6.50 hours at 475.00/hr 3,087.50



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RE: TERVES V. YUEYANG ET AL.
46657-00003

06/30/20 DRAFT REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS
TRADE SECRET COMPLAINT; PERFORM LEGAL RESEARCH
ESTABLISHING THAT COURT CAN TAKE JUDICIAL NOTICE OF
FACTS THAT ARE NOT INCORPORATED INTO COMPLAINT FOR
PURPOSES OF RULING ON MOTION TO DISMISS.

MATTHEW J CAVANAGH 3.50 hours at 475.00/hr 1,662.50



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Invoices Due Upon Receipt

TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

SEPTEMBER 2, 2020
Invoice No: 1393127

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH JULY 31, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEEs FOR SERVICES
EXPENSES

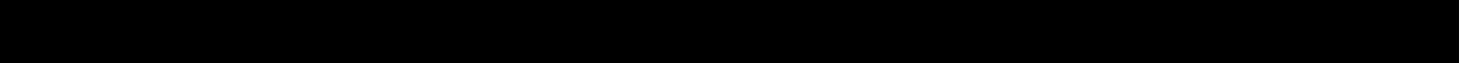
\$

TOTAL

\$

AGING OF ACCOUNT

0 - 30 DAYS	31 - 60 DAYS	61 - 90 DAYS	91 + DAYS	TOTAL
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PAYMENT BY WIRE TRANSFER, ACH, OR CREDIT CARD
CONTACT ACCOUNTS RECEIVABLE AT (216) 348-5445
OR MHACCOUNTING@MCDONALDHOPKINS.COM

PAYMENT BY CHECK
MCDONALD HOPKINS LLC
ATTN: ACCOUNTS RECEIVABLE
600 SUPERIOR AVE, E.
SUITE 2100
CLEVELAND, OHIO 44114



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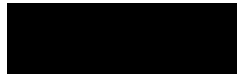
FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

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THROUGH JULY 31, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

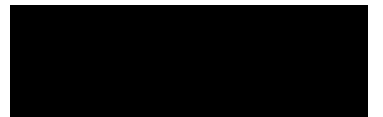
FEES FOR SERVICES

\$



EXPENSES

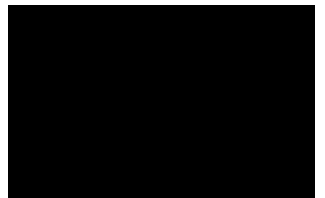
TOTAL



STATEMENT OF ACCOUNT

STATEMENT DATED CURRENT
PREVIOUS BALANCE

TOTAL AMOUNT DUE



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Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003

07/01/20 DRAFT AND REVISE REPLY BRIEF IN SUPPORT OF MOTION TO
DISMISS MMP'S COMPLAINT; [REDACTED]

[REDACTED]
[REDACTED]
PERFORM LEGAL RESEARCH TO RESPOND TO MMP'S ARGUMENT
THAT OKLAHOMA DOES NOT RECOGNIZE A LITIGATION
PRIVILEGE; PERFORM LEGAL RESEARCH TO STRENGTHEN
ARGUMENT THAT FEDERAL COMMON LAW RECOGNIZES A
LITIGATION PRIVILEGE.

MATTHEW J CAVANAGH ~~6.70 hours at 475.00/hr~~ ~~3,182.50~~
6.2 hours at 475.00/hr = 2,945.00

07/01/20 [REDACTED]

[REDACTED]
RESEARCH IN SUPPORT OF REPLY TO MOTION TO DISMISS
MISAPPROPRIATION CLAIMS (1.8)

ANDREW GORDON-SEIFERT ~~3.90 hours at 350.00/hr~~ ~~1,365.00~~
1.8 hours at 350.00/hr = 630.00

07/02/20 CONTINUE TO DRAFT AND REVISE REPLY BRIEF IN SUPPORT
OF MOTION TO DISMISS MMP'S COMPLAINT.

MATTHEW J CAVANAGH 6.90 hours at 475.00/hr 3,277.50

07/02/20 RESEARCH OF CASE LAW TO SUPPORT REPLY TO MOTION TO
DISMISS.

ANDREW GORDON-SEIFERT 1.80 hours at 350.00/hr 630.00

07/03/20 CONTINUE TO DRAFT AND EDIT REPLY BRIEF IN SUPPORT OF
MOTION TO DISMISS MMP'S COMPLAINT; FINALIZE REPLY
BRIEF AND APPROVE SAME FOR ELECTRONIC FILING.

MATTHEW J CAVANAGH 3.40 hours at 475.00/hr 1,615.00



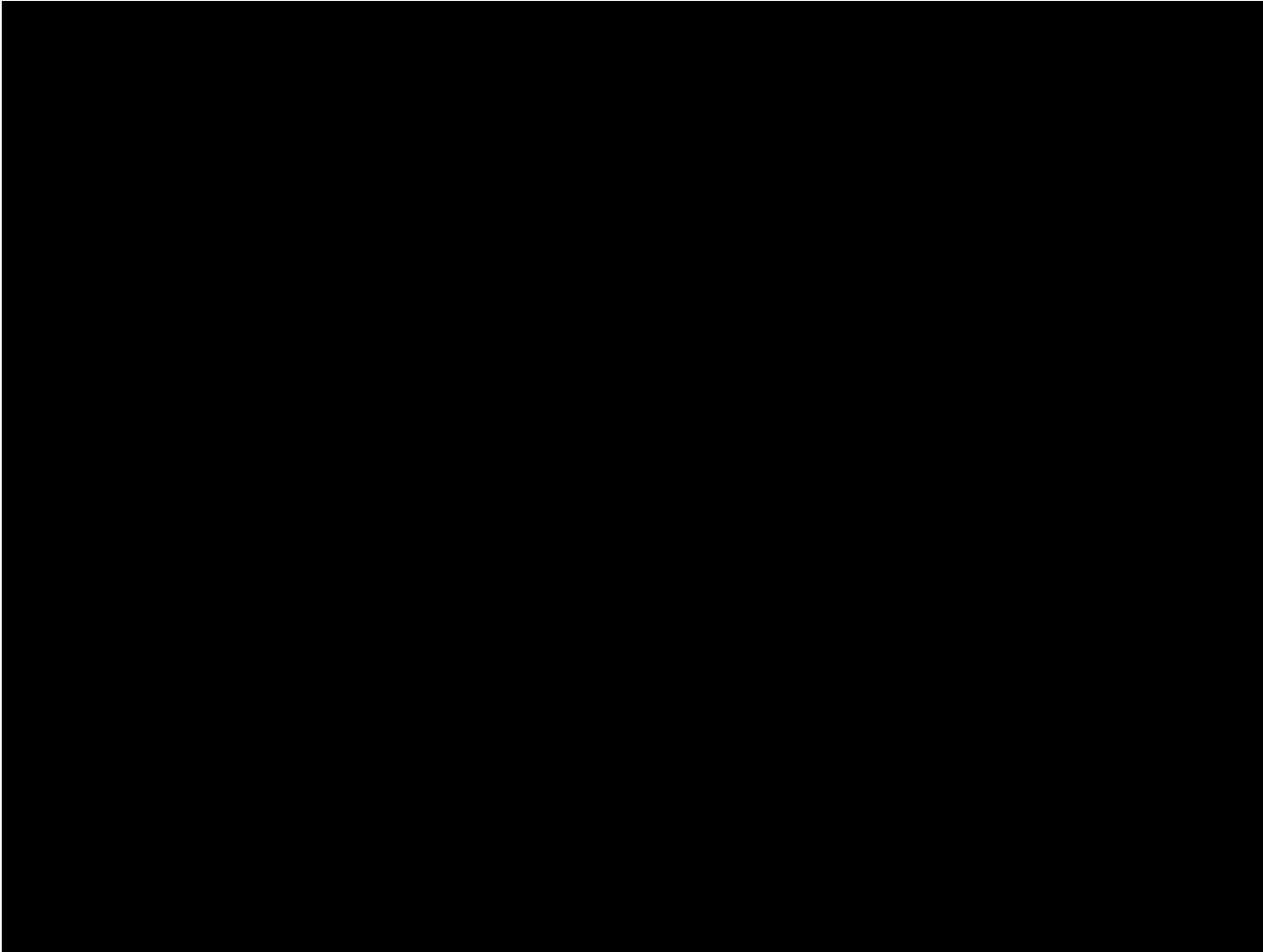
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46657-00003





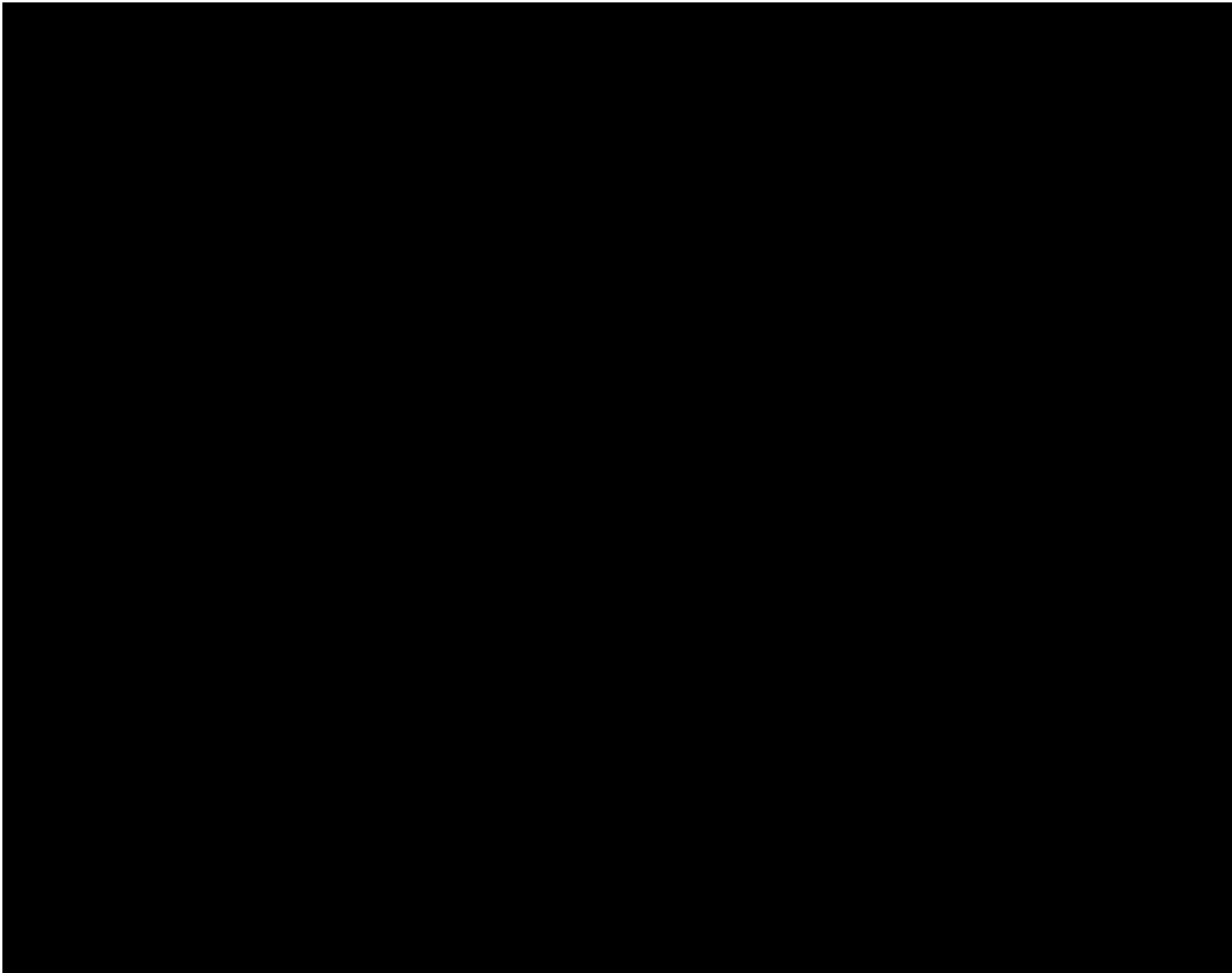
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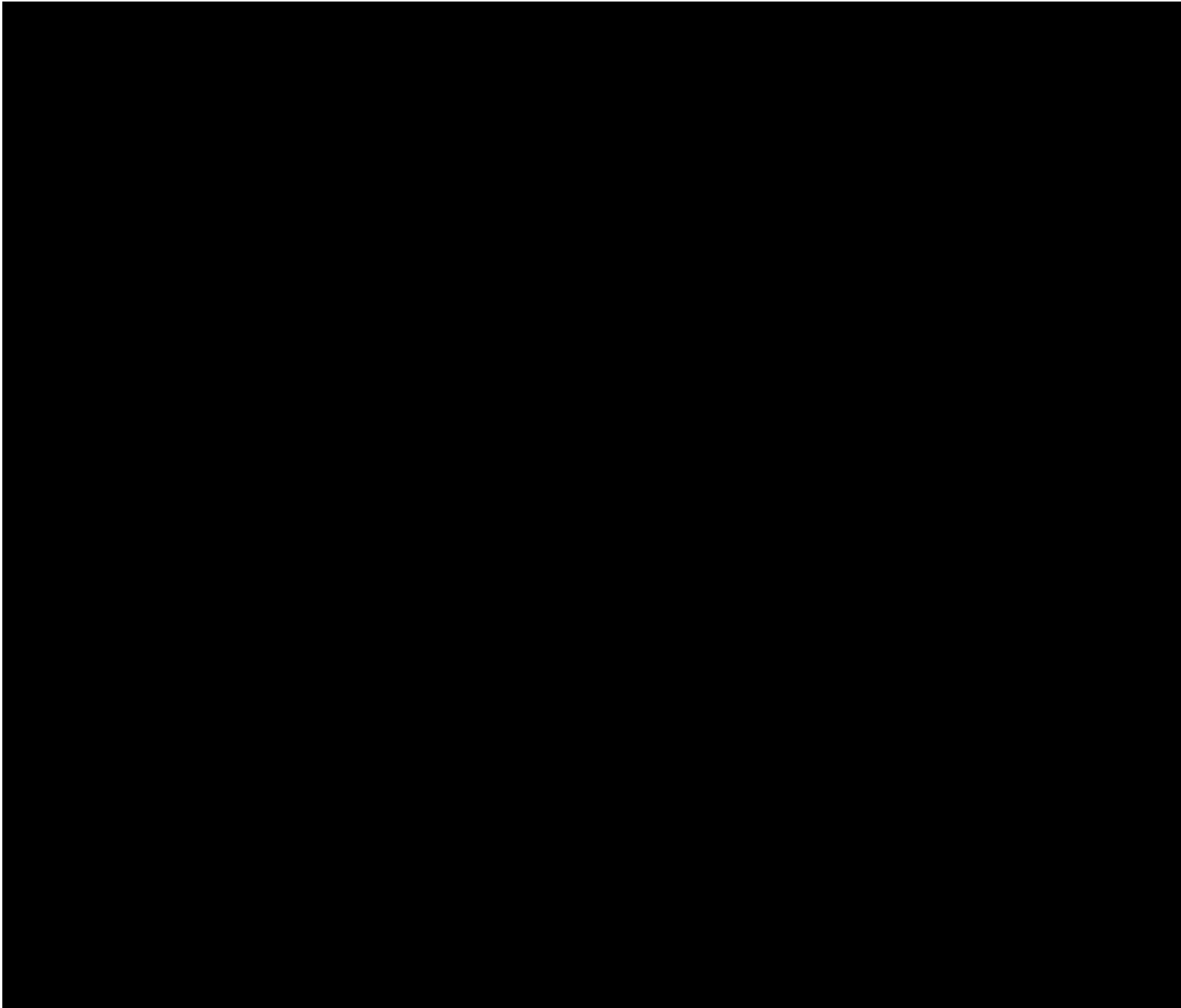
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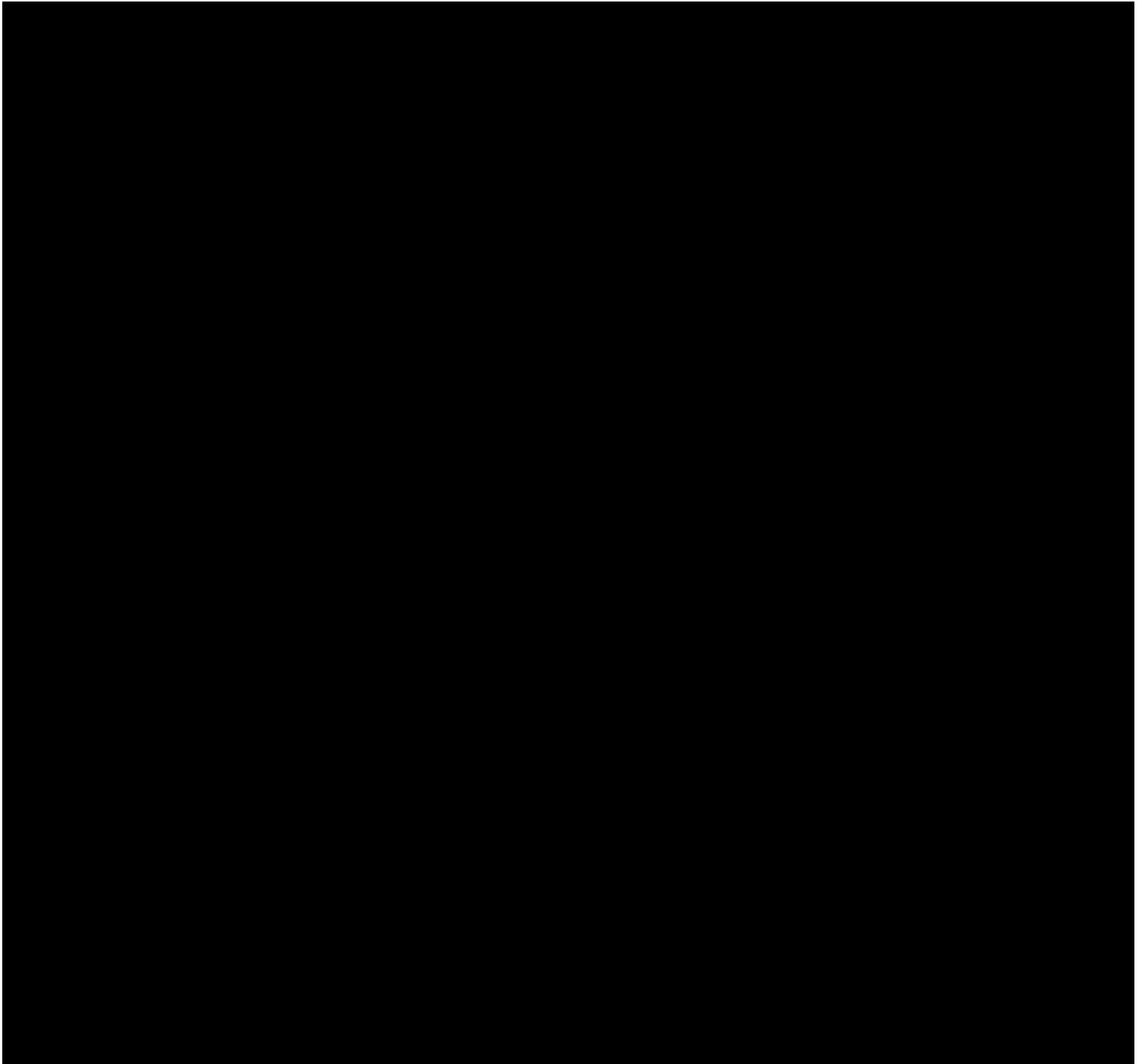
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RE: TERVES V. YUEYANG ET AL.
46657-00003

07/15/20 PERFORM LEGAL RESEARCH TO DETERMINE WHETHER DISMISSAL
ORDER MOOTS MMP'S APPEAL OF ORDER DISSOLVING EX PARTE
SEIZURE ORDER; DRAFT AND REVISE NOTICE TO COURT OF
APPEALS REGARDING DISMISSAL MOOTING APPEAL; EXCHANGE
EMAILS WITH A. SHERMAN REGARDING MOVING FOR
ATTORNEYS' FEES BASED ON DISMISSAL ORDER; [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
MATTHEW J CAVANAGH

~~2.90 hours at 475.00/hr 1,377.50~~

2.0 hours at 475.00/hr = 950.00



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RE: TERVES V. YUEYANG ET AL.
46657-00003

[REDACTED]

[REDACTED]

07/16/20 REVIEW STATUTES AND CASELAW ADDRESSING LEGAL STANDARD
FOR OBTAINING FEE AWARD TO EVALUATE POTENTIAL MOTION
FOR ATTORNEYS' FEES AGAINST MMP; REVIEW FEDERAL RULE
54 REGARDING TIMING OF FEE MOTION; DETERMINE WHETHER

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MATTHEW J CAVANAGH

~~2.10 hours at 475.00/hr 997.50~~

1.8 hours at 475.00/hr = 855.00

[REDACTED]



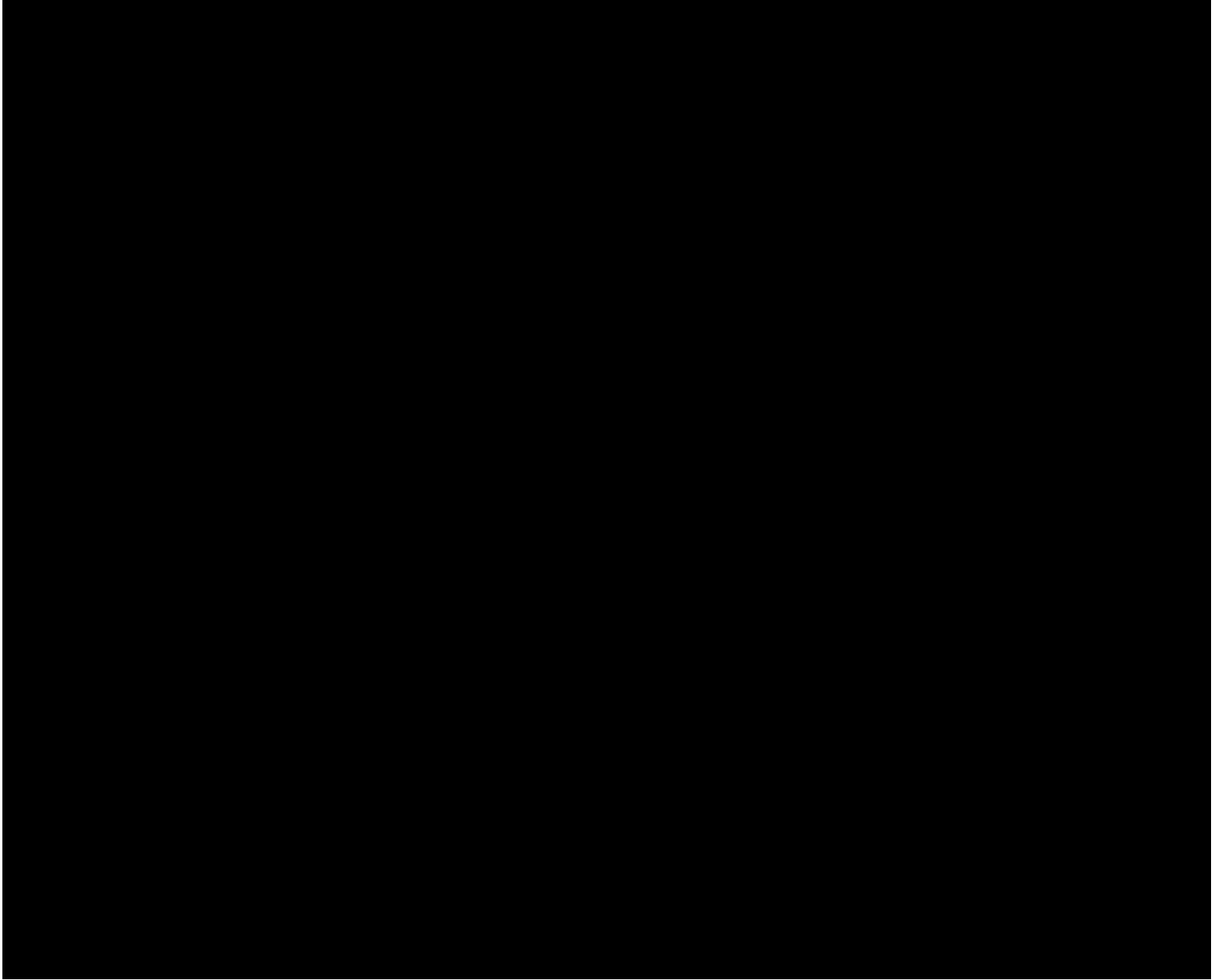
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RE: TERVES V. YUEYANG ET AL.
46657-00003

07/23/20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] CONTINUE TO DRAFT MOTION FOR
ATTORNEYS' FEES IN TRADE SECRET CASE; [REDACTED]
[REDACTED]
[REDACTED]

MATTHEW J CAVANAGH

~~8.20 hours at 475.00/hr~~ 3,895.00
6.0 hours at 475.00/hr = 2,850.00



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RE: TERVES V. YUEYANG ET AL.
46657-00003

07/27/20 CONTINUE TO DRAFT AND REVISE MOTION FOR ATTORNEYS'
FEES AGAINST MMP; [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

MATTHEW J CAVANAGH 5.80 hours at 475.00/hr 2,755.00
5.00 hours at 475.00/hr = 2,375.00

07/28/20 CONTINUE TO DRAFT AND REVISE MOTION FOR ATTORNEYS'
FEES; GATHER AND REVIEW EXHIBITS TO MOTION FOR FEES;
FINALIZE MOTION FOR ATTORNEYS' FEES AND APPROVE SAME
FOR ELECTRONIC FILING.

MATTHEW J CAVANAGH 4.90 hours at 475.00/hr 2,327.50

07/28/20 CALL WITH MEDIATOR AT SIXTH CIRCUIT COURT OF APPEALS
TO DISCUSS NEW APPEAL AND POSSIBILITY OF MEDIATION
TALKS.

MATTHEW J CAVANAGH 0.60 hours at 475.00/hr 285.00



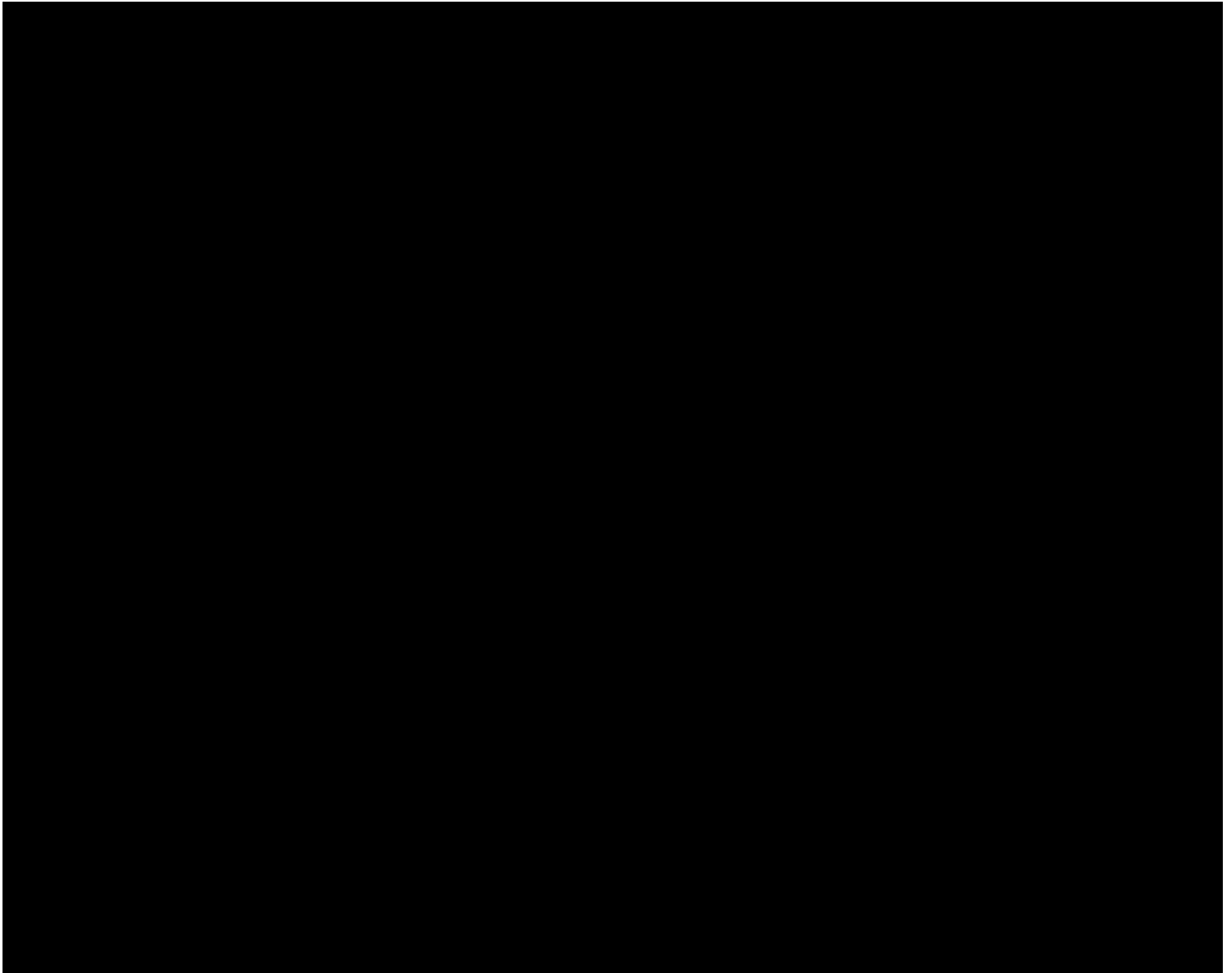
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Invoices Due Upon Receipt

TERVES LLC
ATTN: ANDREW SHERMAN, CEO
24112 ROCKWELL DRIVE
EUCLID, OH 44117

SEPTEMBER 2, 2020
Invoice No: 1393128

FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH AUGUST 21, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES

TOTAL

AGING OF ACCOUNT

0 - 30 DAYS	31 - 60 DAYS	61 - 90 DAYS	91 + DAYS	TOTAL
-------------	--------------	--------------	-----------	-------

PAYMENT BY WIRE TRANSFER, ACH, OR CREDIT CARD
CONTACT ACCOUNTS RECEIVABLE AT (216) 348-5445
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PAYMENT BY CHECK
MCDONALD HOPKINS LLC
ATTN: ACCOUNTS RECEIVABLE
600 SUPERIOR AVE, E.
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SEPTEMBER 2, 2020
Invoice No: 1393128

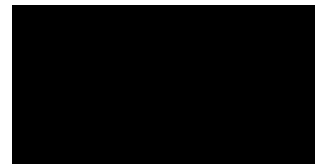
FOR SERVICES RENDERED AND DISBURSEMENTS AS FOLLOWS

RE: TERVES V. YUEYANG ET AL.
46657-00003

THROUGH AUGUST 21, 2020 INCLUDING THE FOLLOWING ITEMIZED SERVICES

FEES FOR SERVICES

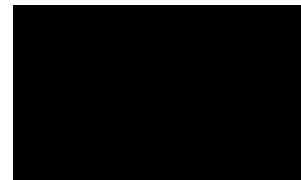
TOTAL



STATEMENT OF ACCOUNT

STATEMENT DATED CURRENT
PREVIOUS BALANCE

TOTAL AMOUNT DUE



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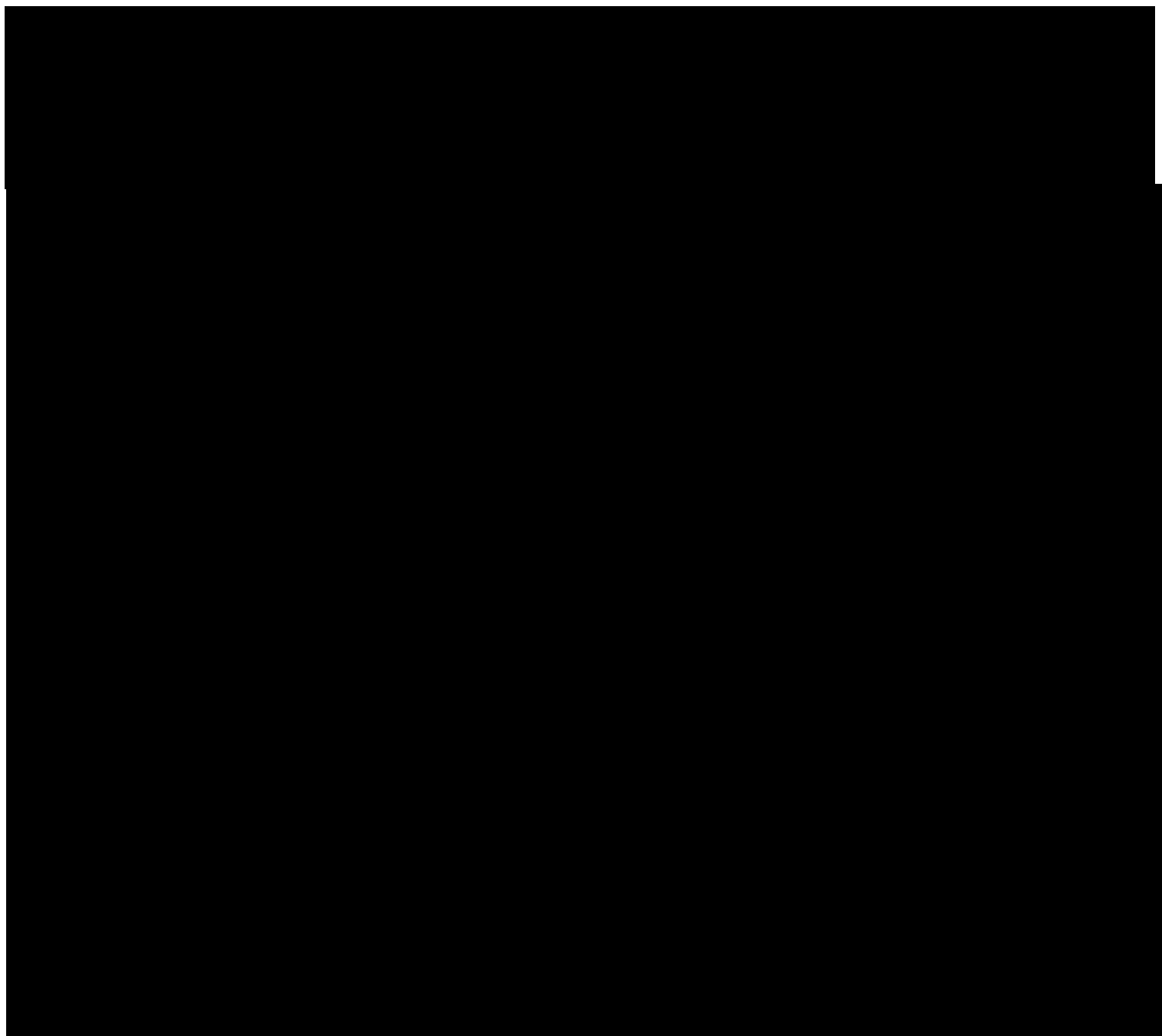
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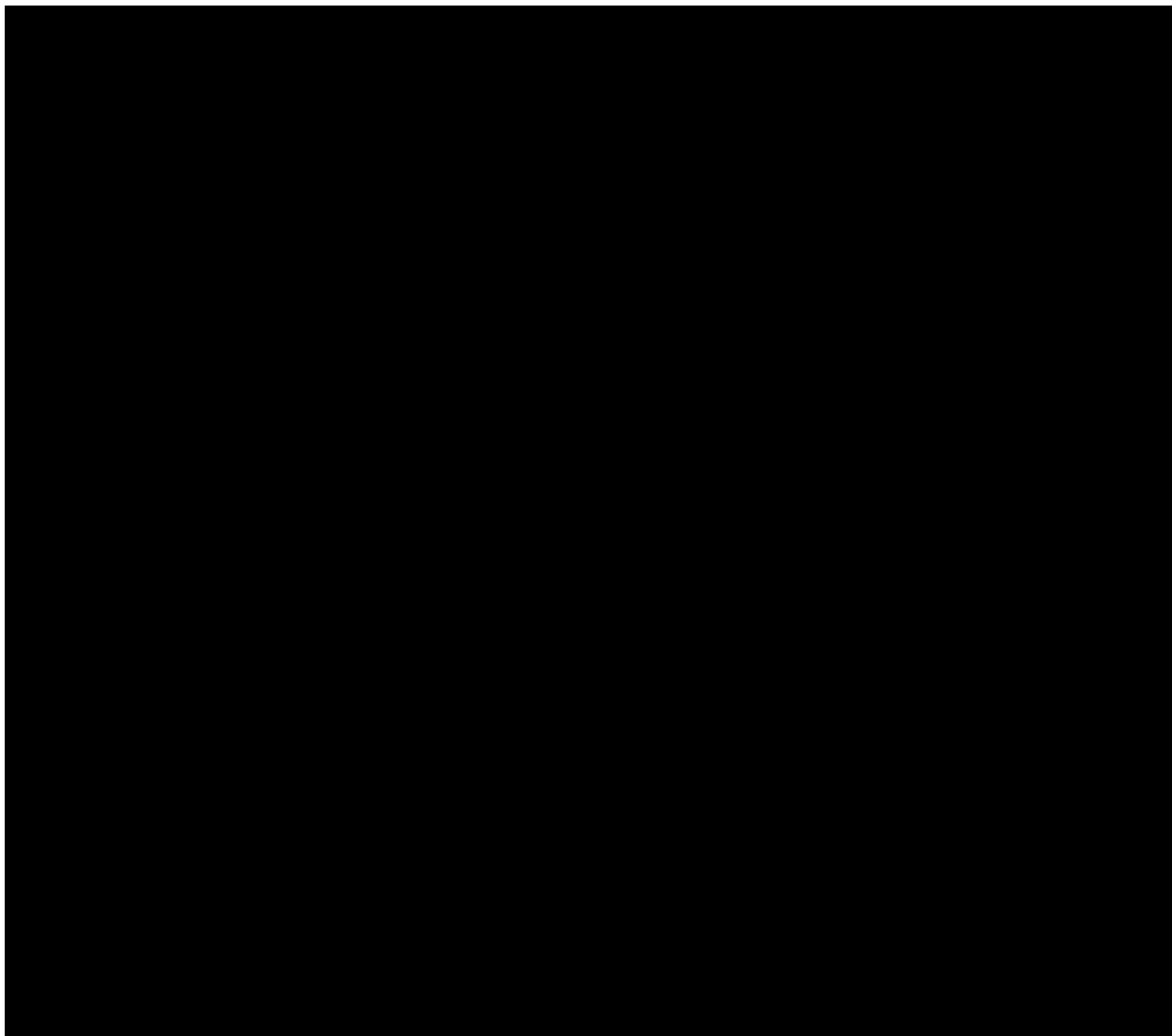
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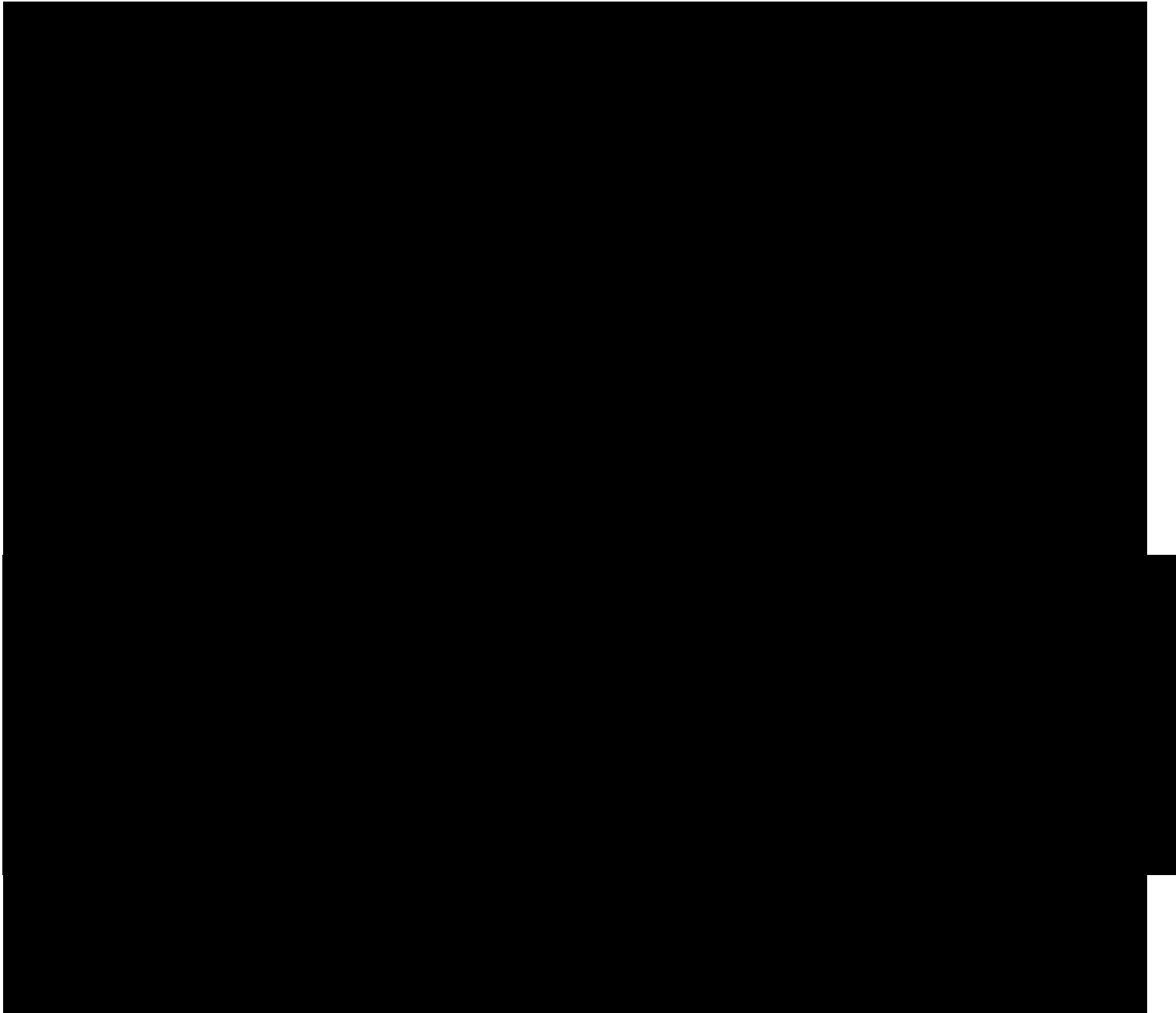
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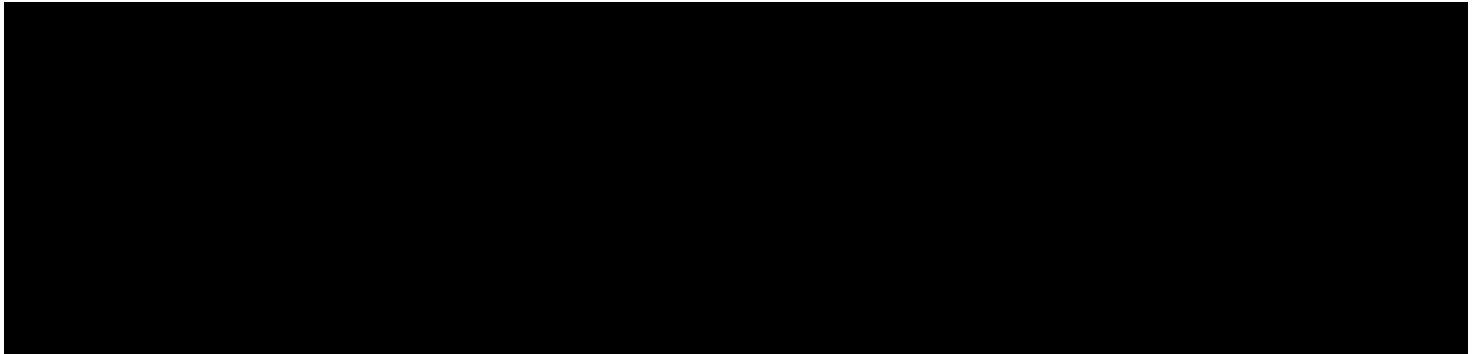
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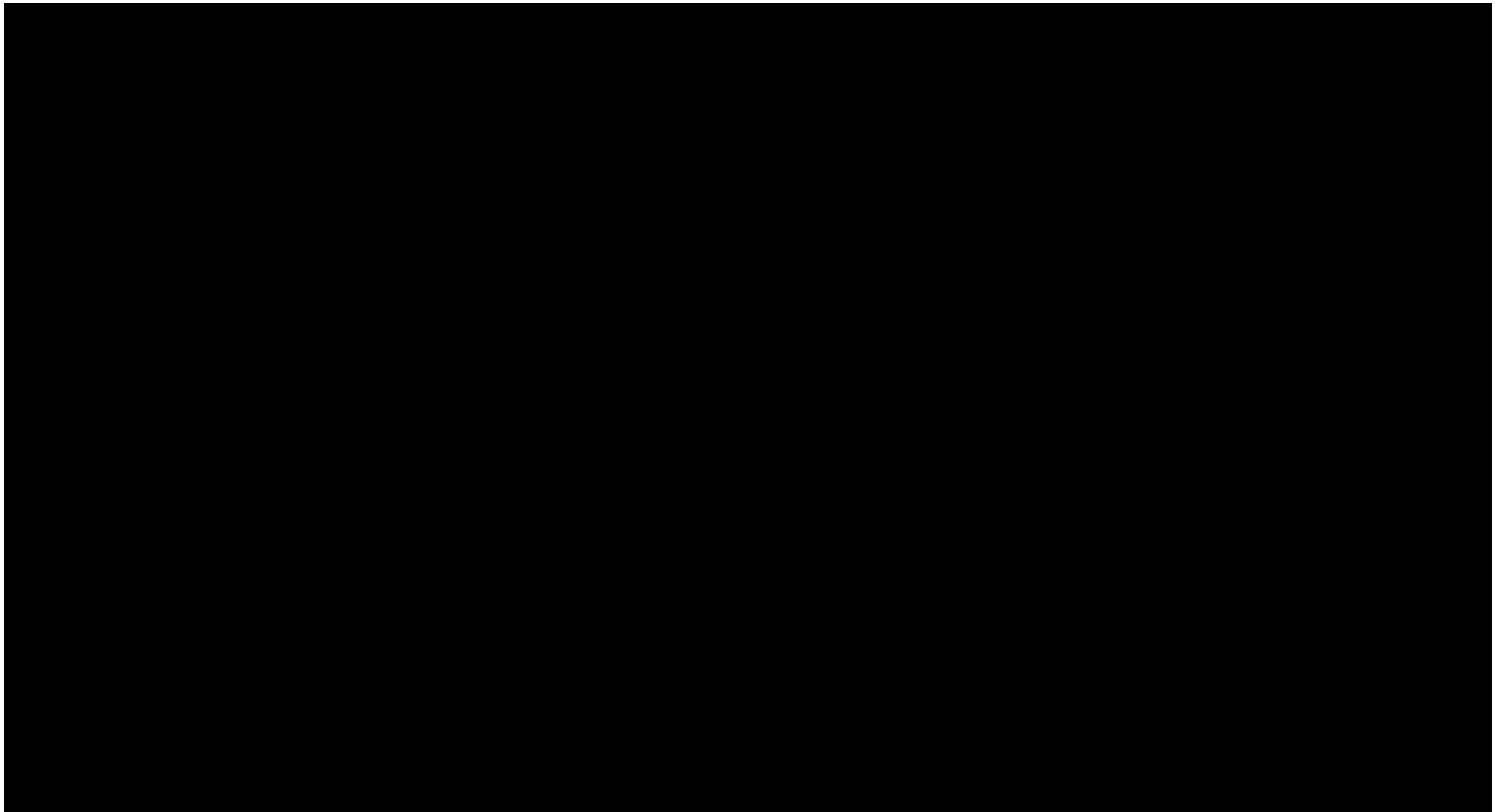


08/12/20 REVIEW AND ANALYZE MMP'S OPPOSITION TO MOTION FOR
ATTORNEYS' FEES AND FORWARD SAME TO A. SHERMAN.

MATTHEW J CAVANAGH

0.70 hours at 475.00/hr

332.50





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Invoices Due Upon Receipt

RE: TERVES V. YUEYANG ET AL.
46657-00003

08/17/20 DRAFT AND REVISE REPLY BRIEF IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES IN MMP TRADE SECRET CASE; [REDACTED]

MATTHEW J CAVANAGH

~~2.00 hours at 475.00/hr 950.00~~
1.7 hours at 475.00/hr. = 807.50

08/18/20 DRAFT AND REVISE REPLY BRIEF IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES IN MMP TRADE SECRET CASE; FINALIZE
REPLY BRIEF AND APPROVE SAME FOR FILING; REVIEW SIXTH
CIRCUIT ORDER DISMISSING MMP'S ORIGINAL APPEAL AS
MOOT.

MATTHEW J CAVANAGH

6.00 hours at 475.00/hr 2,850.00



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